
Policy Statement Human Rights and Environmental Protection Strategy home24

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1. Our social and environmental responsibility

As an internationally active company headquartered in Berlin (Germany), home24 SE, along with its group companies, is aware of its responsibility to respect human rights within its own operations and along its supply chains in order to avoid human rights risks and contribute to environmental protection. As part of its corporate responsibility, home24 SE has firmly integrated human rights and environmental due diligence into its organization and business relationships. These due diligence obligations are continuously monitored and further developed.

home24 SE is aware of its social and environmental responsibility along the entire supply chain and is committed to fulfilling this responsibility in all countries where home24 Group companies or their respective suppliers, operating both nationally and internationally, are active. All companies within Europe that belong to the home24 Group's own operations are collectively referred to in this policy statement as "**home24**" or "**we.**"

We expect respectful conduct towards each other and towards the environment from our business partners and actively promote these values to ensure their strict adherence. Recognized standards form the basis for our expectations, which are primarily set out in our *Business Partner Code of Conduct* for our business partners and our *Code of Conduct* for our own operations. We are aware that taking environmental and social responsibility in the supply chain requires continuous effort, and we will therefore continue to work towards fulfilling these commitments. In doing so, we support our business partners, particularly in high-risk countries, in complying with and implementing new requirements. We prioritize the areas where the most significant human rights and environmental risks exist and where we see the greatest potential for influence. In addition to focusing on our direct business partners, we target processes related to the procurement of our products, as we see potential for human rights and environmental risks in this area.

The results of the risk analyses regarding human rights and environmental risks have a direct impact on the processes at home24. Our risk analyses thus form the basis for identifying key risks and deriving appropriate actions.

Below, we present the human rights strategy of the home24 Group, which primarily outlines the approach to fulfilling our due diligence obligations in accordance with § 6 (2) of the German Supply Chain Due Diligence Act (“**LkSG**”). This policy statement is reviewed for its accuracy at least annually and as needed by the Human Rights Officer of home24, in accordance with § 6 (2) LkSG. If necessary, it is updated and reviewed by the home24 management board.

2. Risk management system pursuant to § 4 LkSG

home24 has established a risk management system in accordance with § 4 LkSG. As part of the already established, adequate, and effective risk management, which is also intended to ensure compliance with due diligence obligations as per § 3 (1) LkSG, an internal control and compliance management system is in place. This system defines responsibilities and aligns measures and controls specifically to ensure adequacy and effectiveness. The risk management system pursuant to § 4 LkSG is embedded in all relevant business processes through appropriate measures. The system enables the identification and minimization of human rights risks and environmental risks, as well as the prevention, cessation, or reduction of violations of human- or environmental rights, provided that home24 has caused or contributed to these risks or violations within the supply chain.

In accordance with § 4 (1) LkSG, the responsibility for risk management and the monitoring of compliance with the due diligence obligations under the LkSG rests with the management board of home24 SE, the parent company of home24. Additionally, home24 has appointed an individual internally to oversee human rights matters. This ensures that the management, i.e., the board of home24 SE, is regularly informed, at least annually, by the responsible person about their work.

In the establishment and implementation of the risk management system, the interests of home24 employees, employees within the supply chains, and those who may be directly affected in a protected legal position by the economic activities of home24 or a company within the supply chain have been and continue to be taken into account through appropriate measures.

3. Risk analysis pursuant to § 5 LkSG

In accordance with § 5 (1) LkSG, the management and coordination of the human rights and sustainability strategy is based on a risk analysis by home24, which forms the foundation of this policy statement. The focus of the risk analysis, which generally takes place annually, is to

identify potential human rights and environmental risks in the company's own operations at the various home24 locations, as well as with our direct suppliers. The risk analysis is also conducted as needed when home24 expects a significantly changed or expanded risk situation within the supply chain. In this context, insights from handling reports according to § 8 (1) LkSG are taken into account in particular. The risk analysis is typically supported by software to identify and assess the risks.

If human rights or environmental risks are identified, these risks are appropriately weighted and prioritized internally by the responsible employees and the appointed person for human rights. The criteria outlined in § 3 (2) LkSG are particularly important in this process, and the aforementioned individuals are required to take these criteria into account. Furthermore, they are responsible for communicating the results of the risk analysis to the relevant decision-makers, i.e., the management board of home24 SE, and, if individual suppliers are affected, to the procurement department.

The following human rights and environmental risks and areas of action have been identified and prioritized in our supply chains and within our own operations:

3.1. Employees of home24

home24 places great importance on the dignity and rights of each individual employee. Many measures have already been taken to establish our human rights-related preventive actions within our own operations in accordance with § 6 (3) LkSG. The working conditions of our employees comply with internationally recognized core labor standards and the applicable laws of the countries in which the employees are active. Adherence to ILO core labor standards is mandatory for us and includes, among other things, the prevention of child and forced labor, the principle of non-discrimination in the workplace, the right to freedom of association and organization, and the right to collective bargaining. Where necessary, we adapt labor and social standards to local conditions, but we ensure compliance with at least the respective national industry standard. Our goal is to create an environment where every employee feels safe and respected and is provided with the necessary conditions for successful work.

Currently, our employees work in Switzerland, Austria, and Germany. The work of our employees includes a variety of activities:

- Administrative activities (e.g., office staff)
- Retail operations (showrooms and outlets)
- Sales personnel
- Distribution (professional drivers, etc..)
- Logistics (warehouse staff)

These diverse activities are associated with different risks. To ensure that every employee is adequately protected in their work, various regulations, guidelines, and measures have been implemented.

3.2. Our business partners

Our suppliers and other business partners

At home24, we place great importance on the selection of our suppliers and other business partners, such as service providers, considering not only economic but especially human rights and environmental criteria. In accordance with § 6 (4) LkSG, we have implemented appropriate preventive measures with respect to our direct suppliers. Environmental, occupational safety, and social standards, as well as compliance with (local) laws, are key aspects considered when evaluating new and existing supplier relationships. These standards are embedded in our *Business Partner Code of Conduct*, which forms the foundation for our collaboration with suppliers. We are aware that the ethical standards of our suppliers can have an impact on our working conditions and the environment. Therefore, we are always striving to make future-proof, sustainable, and responsible decisions, particularly when the abstract risk analysis indicates a high risk due to the location of the suppliers.

Particularly in high-risk countries, we continuously support our business partners in complying with and/or implementing new standards. Our goal is to ensure that all our business partners meet the same high standards to provide a safe and legally compliant working environment for all parties involved and to uphold human rights and environmental standards. We work closely with our suppliers and assist them in implementing these standards within the supply chain.

Our customers

The products we offer are subject to various regulations, standards, and norms. Through strict controls within the framework of our quality management system, we ensure that no significant risks arise for our customers or the environment, and that appropriate and effective preventive measures can be implemented.

3.3. Risk management and monitoring

As part of our corporate responsibility, we are committed to identifying, understanding, and avoiding any negative impacts of our actions on people and the environment. To achieve this goal, a comprehensive process for identifying human rights and environmental risks within our supply chain is necessary. The management board of home24 SE is responsible for establishing an appropriate risk management system to fulfill our corporate due diligence obligations. In the 2022 financial year, we conducted an initial analysis and have continuously developed this process, particularly with regard to the requirements of the LkSG from 2024 onwards. We take into account relevant business partners, the individual stages of the supply chain, local conditions,

and activities. We assess the likelihood of human rights and environmental violations, the potential impact on the affected parties, and the possibility of preventing these through home24's influence. To address human rights and environmental risks in our supply chains, we have committed to establishing appropriate preventive measures. We ensure that our products and processes are designed to be environmentally and socially responsible, prioritizing areas where the impact on people is deemed to be greatest and where we have the most significant influence. Our goal is to build and maintain long-term business relationships in order to achieve sustainable change.

Complaint mechanisms are an essential part of our efforts to sustainably embed human rights and environmental protection in supply chains. They help us identify violations of labor and environmental standards and, in the next step, work together with those affected and the responsible parties to provide remedy. These measures are integrated with our other efforts to comply with social and environmental standards to ensure a holistic and sustainable solution.

In accordance with § 9 (1) LkSG, home24 has established the complaint procedure in a way that allows individuals to report human rights and environmental risks, as well as violations of human rights or environmental obligations that arise from the economic activities of indirect suppliers. Once we have indications that a violation of a human rights or environmental obligation might have occurred with indirect suppliers, we conduct a targeted risk analysis. Following this, appropriate preventive measures are implemented, such as carrying out control measures or providing support in the prevention and avoidance of risks. As needed, a concept for the prevention, cessation, or minimization of the risk is developed and implemented, and the policy statement in accordance with § 6 (2) LkSG is updated.

Based on this risk analysis, we define human rights and environmental expectations for our employees and business partners in accordance with § 6 (2) No. 3 LkSG. In our risk analyses, we consider the relevant industries of the product components used, the different value creation stages, and country-specific factors. From this comprehensive assessment, we derive abstract risks. At the points where potential risks emerge, we conduct detailed risk assessments.

Furthermore, we continuously assess the human rights situation in the countries of production based on publications from human rights organizations and research institutes. The insights gained from this are directly integrated into our procurement strategy and form a key foundation for home24's actions.

4. Preventive measures pursuant to § 6 (3) to (5) LkSG

In the event of identified risks within our own operations, we establish appropriate preventive measures in accordance with § 6 (3) LkSG, such as the implementation of the human rights strategy outlined in the policy statement into relevant business processes at home24, the development and implementation of suitable procurement strategies and purchasing practices aimed at preventing or minimizing identified risks, conducting employee training in relevant business areas, and carrying out risk-based control measures to monitor compliance with the human rights strategy described in the policy statement within our own operations.

Suppliers with whom we identify risks through our abstract risk analysis are systematically sent a self-disclosure questionnaire. This questionnaire enables the analysis of specific risks or the identification of violations.

In the case of identified specific risks with direct suppliers, we implement appropriate preventive measures in accordance with § 6 (4) LkSG. We thereby assess our influence, evaluate the likelihood of human rights and environmental violations, and estimate the severity of the impact on those affected. Preventive measures include communicating our human rights and environmental expectations when selecting a suitable direct supplier. Furthermore, our direct suppliers contractually commit to meeting our human rights and environmental expectations and addressing them adequately throughout the supply chain. To enforce these contractual commitments from direct suppliers, we regularly communicate our expectations, for example, through digital information letters and the *Business Partner Code of Conduct*, which applies to all suppliers. Additionally, in the case of identified risks, training and educational programs are conducted to enforce the contractual commitments. Finally, we agree on appropriate contractual control mechanisms and their risk-based execution with suppliers to ensure compliance with the human rights strategy at the direct supplier level.

We evaluate the effectiveness of these preventive measures in accordance with § 6 (5) s. 1 LkSG once a year and on an ad-hoc basis if and to the extent that we anticipate a significantly changed or expanded risk situation in our own operations or with one of our direct suppliers, for example, due to the introduction of new products, projects, or a new business area. In doing so, we also take into account insights from the established grievance procedure in accordance with § 8 LkSG and promptly update the measures if necessary.

5. Corrective actions pursuant to § 7 LkSG

If we determine that a violation of a human rights or environmental obligation has already occurred or is imminent in our own operations or with a direct supplier, we will take appropriate remedial measures in accordance with § 7 (1) LkSG without undue delay. These measures will ensure that the violation is ended, the extent of the violation is minimized, or

the violation is prevented. The provisions of § 5 (1) s. 2 LkSG will be internally considered accordingly.

If the violation concerns our own operations within Germany, the remedial measure will be chosen to ensure the violation is terminated. If the violation concerns our own operations abroad, the remedial measure will be selected so that it generally leads to the termination of the violation. If the violation of a human rights or environmental obligation involves a direct supplier and is such that it cannot be ended in the foreseeable future, we will develop a plan with a concrete timeline for termination or minimization in accordance with § 7 (2) LkSG and implement it, taking into account the measures listed in § 7 (2) Nos. 1 to 3 LkSG.

The termination of a business relationship is required for home24 in accordance with § 7 (3) LkSG only if the violation of a protected legal position or an environmental obligation is considered very severe, the implementation of measures within the specified time does not lead to remedy, or if home24 has no milder means available and an increase in influence is unlikely to be successful.

The effectiveness of these remedial measures will be reviewed annually and on an ad-hoc basis in accordance with § 7 (4) LkSG. The criteria outlined earlier for ad-hoc monitoring applies.

6. Complaints procedure pursuant to §§ 8, 9 LkSG

The complaint procedure established by home24 in accordance with § 8 LkSG allows individuals (both internal and external) to report human rights and environmental risks and/or violations that have occurred or could occur due to the business activities of home24 or one of its direct suppliers.

We ensure responsible and careful handling of all incoming reports. Additionally, we make sure that reports are treated confidentially, impartially, and objectively, and undergo thorough examination so that whistleblowers and affected parties receive the highest level of protection. The individuals responsible for the complaint procedure work impartially and independently. They are not bound by instructions in the context of their work on the complaint procedure and are obligated to confidentiality. The complaint procedure is designed in such a way that, in accordance with § 9 LkSG, it also allows for the reporting of human rights or environmental risks, as well as violations by indirect suppliers.

Further information about the complaint procedure, such as its accessibility, responsibility, the exact process for handling a whistleblower report, including confirmation of receipt and discussion of the matter, as well as protection from retaliation or punishment, can be found in the publicly accessible procedural guidelines ([here](#)).

The effectiveness of the complaint procedure is reviewed at least annually and on an ad-hoc basis. The previously outlined criteria for ad-hoc checks apply.

7. Documentation and reporting obligations pursuant to § 10 LkSG

The measures for implementing our due diligence obligations are continuously and systematically documented in accordance with § 10 LkSG. This documentation is retained within the company for seven years from its creation. The annual report on the fulfillment of due diligence obligations for the past financial year will be published on our company website in accordance with § 12 Abs. 2 LkSG, no later than four months after the end of the financial year. It will be available free of charge and publicly accessible on the website for seven years. For the preparation of the report, we utilize the technical tools provided by the Federal Office for Economic Affairs and Export Control (BAFA, digital questionnaire and online submission).

The report clearly outlines which human rights and environmental risks or violations of human rights or environmental obligations home24 has identified, what home24 has undertaken to fulfill its due diligence obligations, how home24 assesses the impact and effectiveness of the measures, and what conclusions home24 draws from the evaluation for future actions.

Berlin, February 2025

Management Board of the home24 SE