

## **Otto Group Code of Conduct Services and Non-Merchandise Goods**

(version: August 2025)

To respect human rights, environmental protection and fair cooperation are the pillars upon which a liveable society is built. It is the declared goal of the Otto Group to harmonize economic, ecological and social responsibility within a sustainable framework.

We see human rights due diligence not only as the basis for our actions, but also as the basis for cooperation with our business partners. Our cooperation with our business partners is based on partnership and mutual respect.

The scope of these requirements includes all business partners of non-merchandise goods and services of the Otto Group's national and international Group companies (hereinafter also referred to as the "Otto Group"). The Otto Group comprises all companies affiliated with Otto GmbH & Co. KGaA in accordance with Section 15 of the German Stock Corporation Act (AktG). Each business partner undertakes to comply with and apply the requirements of this Code of Conduct in a binding manner and to pass them on to their business partners in the upstream supply chain also in a binding manner.

The following requirements are essentially based on:

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- ILO core labor standards

### **1. General Obligations**

#### **Compliance with Laws**

The Otto Group requires all its business partners to comply with all applicable legal requirements, both at its company location and in the countries in which its services and products are manufactured, provided, used and/or sold. The requirements of the Otto Group in this Code of Conduct may go beyond the applicable legal provisions of the respective country.

## 2. Human Rights and Working Conditions

### Health and Safety

Business partners must ensure a safe and healthy working environment in accordance with the occupational health and safety obligations applicable under the law of the place of employment.

Business partners shall take the necessary measures to prevent accidents and work-related damage to health that may arise in connection with the activity. To this end, business partners shall establish and implement safety standards and protective measures to detect, prevent and/or eliminate potential risks to the health and safety of their employees. In particular, all appropriate protective measures must be implemented to ensure the safety of the workplace, the workplace and the work equipment and to avoid exposure to chemical, physical or biological substances. They must also ensure that employees are regularly informed and trained on applicable health and safety standards and safety measures. Business partners must document the trainings.

Business partners who accommodate some or all of their employees in collective accommodation inside or outside their premises must ensure that the accommodation is adequate to protect the health and safety of employees. In addition, business partners must regularly check that the accommodation is appropriate.

### Working Hours

Working hours, including overtime, must comply with the applicable law of the place of employment, industry standards or the relevant ILO conventions, whichever is stricter. Employees are entitled to at least one day off after six consecutive working days, unless exceptions stipulated in collective agreements apply. Care must be taken to prevent excessive physical and mental fatigue, in particular due to unsuitable work organization with regard to working hours and rest breaks. Any overtime worked must be remunerated separately in accordance with national standards.

### Remuneration and Social Benefits

Business partners must guarantee their employees an appropriate wage that corresponds at least to the applicable statutory/collectively agreed minimum wage or the minimum wage customary in the industry. If there are neither statutory/collective bargaining nor industry-standard minimum wages at the place of employment, the business partner must ensure that the wage paid is essentially sufficient to cover the basic requirements of the employees, taking into account individual circumstances (such as purely ancillary income activities, part-time employment, etc.).

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

## **Freedom of Association**

Business partners shall respect the right to freedom of association, according to which employees are free to form or join trade unions and trade unions are free to operate within the legal framework of the place of employment, which includes the right to strike and the right to collective bargaining. Business partners must ensure vis-à-vis their employees that joining and being a member of a trade union is not used as a reason for discrimination or retaliation.

## **Unequal Treatment**

Any discrimination in recruitment and employment is prohibited. In particular, any unequal treatment based on national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, skin color, membership of an employee organization or other personal characteristics is prohibited, unless it is justified by the requirements of employment. Unequal treatment includes in particular the payment of unequal remuneration for work of equal value. The Otto Group's business partners are also responsible for those employees who are employed through agencies or other intermediaries.

## **Bonded Labor, Forced Labor or Human Trafficking**

Slavery, forced labor, bonded labor, indentured labor, human trafficking or involuntary labor, including state-imposed forced labor, are not tolerated by the Otto Group in any form. No employees may be directly or indirectly forced into employment through violence and/or intimidation. Persons are only to be employed if they have voluntarily made themselves available for employment. Instructing or forcing employees to perform involuntary labor, in particular as a result of debt bondage or human trafficking, is prohibited. In order to avoid bonded labor, there shall be no employment fee charged to workers who are employed through agencies and intermediaries. All employees must be treated with dignity and respect. No employee may be subjected to verbal, psychological, physical, sexual and/or physical violence, coercion or harassment.

The Otto Group's business partners are also responsible for those employees who are employed through agencies or other intermediaries and must also ensure that no forced or compulsory labor takes place.

## **Child Labor and Young Workers**

No person under the age of 15 may be employed directly or indirectly (unless the exceptions recognized by the ILO apply). The Otto Group also does not permit the employment of persons younger than the age at which compulsory schooling ends or younger than the legal working age if this is higher than 15 years (Gregorian calendar). In addition, children under the minimum working age are not permitted on the premises of the place of employment, except in places designated for childcare. The Otto Group's business partners are obliged to take the necessary measures to prevent the employment of persons under the legal minimum age. Stricter national laws of the country of employment for the protection of children and young employees must be

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

### **3. Environmental Protection and Land Use**

#### **Environmental Protection**

Business partners must comply with the applicable environmental laws. The Otto Group also expects its business partners to work continuously and systematically to avoid and reduce environmental pollution.

Business partners are required to use natural resources sparingly and to switch to renewable energy sources wherever possible.

With regard to environmental risks caused by illegal production, use, collection, storage and disposal of mercury and mercury products, persistent organic pollutants (POPs) and hazardous waste, business partners are obliged to comply with the prohibitions of the Minamata Convention, the POPs Convention and the Basel Convention, as amended, as well as the applicable EU regulation or national legislation.

The protection and preservation of natural resources by avoiding harmful soil changes, air or water pollution, harmful noise emissions or excessive water consumption must be ensured. In particular, activities that are harmful to people's health, deny or impede people's access to safe drinking water and sanitary facilities and significantly impair the natural basis for the preservation and production of food are prohibited.

#### **Forced Eviction**

The prohibition of unlawful forced eviction and the prohibition of unlawful deprivation of land, forests and water in connection with the development or other use of these resources by business partners, the use of which secures the livelihood of a person or group of persons, must be observed.

### **4. Business Ethics**

#### **Use of Security Forces**

When commissioning or using private or public security forces, any form of violence, inhuman or degrading treatment, injury to life or limb and the impairment of freedom of association and union must be prevented by ensuring that the security forces are appropriately instructed and monitored by the business partners.

## **Bribery and Corruption**

The Otto Group sees corruption as a cross-cutting issue, as corruption can undermine efforts to protect human rights and the environment and does not tolerate any form of bribery or corruption. All business partners and their employees must behave in such a way that no personal dependency, obligation or influence arises. Business conduct based on fairness and compliance with the applicable national and international standards is expected of everyone. Furthermore, the business partner shall implement anti-bribery and anti-corruption regulations in all business areas. If gifts are customary and polite in the respective country, it must be ensured that no binding dependencies arise as a result and that the applicable national legal standards are observed.

Indications of corrupt behavior should be reported to the Otto Group using the whistleblower system (see description in number 5).

## **Data Protection**

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

# **5. Implementation and Control**

## **Management Processes**

The business partners undertake to anchor suitable and effective processes in their organizational structures and work processes in order to monitor and ensure compliance with all elements of this Code of Conduct.

## **Dealing with Reports and Infringements**

Complaints or indications of infringements of the Otto Group Code of Conduct for Services and Non-Merchandise Goods can be submitted to the Otto Group at any time - also in anonymized form - via the [SpeakUp whistleblowing system](#). The whistleblower can set up a digital mailbox in SpeakUp and exchange information with the responsible compliance unit - in such a way that the highest level of protection for whistleblowers can be guaranteed.

In addition, the external compliance ombudsperson, Dr. Buchert, is available worldwide as an independent and confidential contact person. As a lawyer, he is subject to a duty of confidentiality and may not pass on any information to third parties - however, with the consent of the reporting person, he can initiate the appropriate steps within the Otto Group.

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All complaints or indications of infringements that we receive (regardless of the channel) will be carefully investigated by the Otto Group. Depending on the outcome, we will take appropriate remedial action.

Whistleblowers are encouraged to report only those reports of violations that they believe in good faith to be true. All business partners must guarantee that they will refrain from taking disadvantageous measures or disciplinary action against whistleblowers.