



**fielmann
group**

DECLARATION OF PRINCIPLES
ON HUMAN RIGHTS

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1. Basic position

The Fielmann Group (“Fielmann”) is a stock-listed family business based in Hamburg, Germany. As the most customer-oriented provider of eyewear, contact lenses and hearing aids, we serve our 28 million active customers through an omnichannel platform comprised of digital sales channels and more than 1.000 retail stores.

Our “You are the customer!” philosophy makes us successful across brands and countries. The commitment to the people around us is part of our self-image and our purpose “We help everyone hear and see the beauty in the world”. This foundation of values forms the compass with which we further develop our family business and perform our daily work for the benefit of everyone.

Fielmann assumes responsibility for its customers, its employees, society and the environment. We are convinced that our company can only be successful in the long term in an intact and socially balanced environment. Investments in the community are investments in the future.

Fielmann respects the dignity of every individual and the law. This applies regardless of whether it is international or local law. We demand the same from our employees as well as from our business partners. Our company is characterised by the trusting and responsible interaction of all employees, respect for human rights, the protection of natural resources, and our business conduct.

We respect human rights in our global value and supply chains. Our goal is to promote their application and prevent their violation. Together with our employees, customers, business partners and other stakeholders, we are committed to the promotion of human rights. This is particularly reflected in our commitment to fair business practices and good working and living conditions.

Based on this, we have drawn up this declaration of principles for all companies in the Fielmann Group. It supplements existing company principles and guidelines and relates to our activities at all locations, stores and business units worldwide.

The basis of human rights due diligence at the Fielmann Group is our commitment to respecting human rights, as set out in particular in the following internationally recognised frameworks:

- UN Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- UN Guiding Principles on Business and Human Rights
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination Against Women
- Core Labour Standards of the International Labour Organization (ILO)
- OECD Guidelines for Multinational Enterprises

2. Expectations of employees and suppliers of the Fielmann Group

This declaration of principles applies to our employees in all companies of the Fielmann Group. With these standards, we oblige all employees worldwide to conduct themselves appropriately and lawfully towards other employees and suppliers.

As we rely on our suppliers in our business activities and our direct suppliers, in turn, rely on other suppliers along the value chain, we also expect our direct suppliers to comply with these standards and to pass on our commitment to respect human rights to their respective suppliers.

Compliance with the highest applicable standard of local laws and with the requirements of the ILO Core Labour Standards is essential in this regard. The following principles apply in particular to the organisation of working conditions and supplier relationships:

- Compliance with the ban on child and forced labour
- Equal treatment of all employees and no tolerance of discrimination
- Ensuring health and safety in the workplace
- Granting remuneration at least in the amount of statutory guaranteed minimum wages with working hours in accordance with the applicable standards
- Personal data protection
- Recognition of the right of all employees to form employee representative bodies and to engage in collective bargaining to regulate working conditions

These principles are anchored in the companies of the Fielmann Group and form part of our contractual agreements with our business partners (Supplier Code of Conduct).

3. Identified risks

We identify the priority human rights and environmental risks through our regular risk analysis. We have identified the work-related topics of child and forced labour, remuneration, discrimination, occupational safety and freedom of association, as well as the general topic of data protection and privacy as priority risks.

4. Implementation of due diligence

We see the identification of risks and potential impacts as well as the derivation of effective measures as an ongoing challenge in our implementation of human rights and environmental due diligence obligations.

a. Risk analysis

In order to review the impact of our actions on human rights, we carry out risk analyses as part of our risk management system, both annually and on an ad hoc basis. We classify the risks of our business partners as well as our own business units and products on a company-specific basis, based on the analysis of recognised indices and studies relating to the risk assessment of the countries of origin and products. The findings of the risk analyses are incorporated into the development of specific measures to avoid or mitigate any adverse effects of our business activities. The Fielmann Group focuses on an interplay of different measures and integrates the findings from these activities into its business processes.

b. Preventive measures

To avoid or mitigate identified human rights risks, we have introduced various preventive measures. We monitor their effectiveness on an ongoing basis and adjust them as necessary:

- The Supplier Code of Conduct provides a binding framework to all our core product group suppliers and all other suppliers with not only insignificant sales levels with regard to their respective employees and suppliers. Our contracts also provide for the possibility of internal on-site inspections as well as external audits to regularly monitor compliance with the standards set out in this declaration of principles. In addition, we also require our direct suppliers to demand human rights compliance from their respective suppliers.
- The risk analysis is supplemented by supplier surveys, media research and any necessary internal and/or external on-site inspections. We train our employees on an ongoing basis.

- We also regularly review compliance with the standards in this declaration of principles and consider the standards as part of preventive due diligence on planned investments in locations, facilities, equipment and financial assets.
- We actively work towards compliance with and implementation of these standards along the value chain. The commitment of our direct suppliers of the core product groups as well as other suppliers with not only insignificant sales levels to comply with these standards is an indispensable prerequisite for lasting business relationships. Respect for human rights is an important evaluation criterion in the selection of our direct suppliers.
- We also strive to comply with these standards with regard to indirect suppliers. If we obtain substantiated knowledge of a (possible) violation at an indirect supplier, we conduct a risk analysis and take appropriate preventive and remedial measures.

c. Remedial measures

If we identify violations that are either imminent or have already occurred in our own business area, we will prevent or stop them. The same applies – if possible – to breaches at one of our suppliers. If a violation at one of our suppliers is such that we cannot prevent or stop it in the foreseeable future, and be it by terminating the business relationship, we will immediately create and implement a concept to end or minimise it.

5. Responsibility

The person appointed by us monitors the implementation of and compliance with this declaration of principles and reports directly to the company management. The impact of our business activities on human rights and possible preventive and remedial measures are discussed at regular meetings and human rights-related activities and guidelines are adopted. The relevant departments and functional areas, in particular Legal, Compliance, CSR and our purchasing department, are closely involved in this process.

6. Complaints procedure

We have set up an online reporting system for our stakeholders to confidentially report complaints and information on human rights violations at fielmanngroup.integrityline.com. Everyone has access to this complaints system, regardless of the existence or nature of the contractual or business relationship with us. The confidential handling of complaints and a fair procedure for dealing with complaints are guaranteed. We expressly encourage our employees to report suspected violations of this declaration of principles.

7. Documentation and reporting

We publish up-to-date information every year – in particular with regard to identified risks, measures taken and their assessment as well as conclusions from the assessment for future measures – in our Annual Report under the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (LkSG). The reports can be accessed free of charge on our corporate website. We also update this declaration of principles on an ongoing basis.

Hamburg, November 2023



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