

## Policy Statement – TOI TOI & DIXI Group

### Introduction:

Recognising and respecting human rights and the environment are an integral part of TOI TOI & DIXI's company philosophy. Along our entire supply chain, we are committed to preserving human rights and conserving the environment. For this reason, we are expressly dedicated to respecting and safeguarding human rights and the environment, and adhering to the relevant standards. Through our risk management system, we take responsibility for humankind and the environment and consistently implement the applicable laws and directives. If, in spite of all the risk management measures that we have taken along our entire supply chain, infringements should nevertheless occur, we provide those affected by such infringements the opportunity to access complaints channels, and we implement appropriate corrective measures.

Through this Policy Statement, we are proclaiming our responsibility across our entire value and supply chain. The Policy applies throughout our organisation and for all our suppliers.

### Human rights strategy:

TOI TOI & DIXI is firmly committed to respecting internationally recognised human rights and emphatically abiding by them when conducting any business activity along our value chains. This commitment entails the performance of a number of measures, including:

- prohibiting any form of child labour and forced labour: We adhere to strict guidelines that prohibit any form of child labour or forced labour, whether in our business activities or our supply chain.
- prohibiting all forms of slavery and discrimination: We remain resolute in our commitment to oppose any form of slavery or discrimination and promote a workplace environment that upholds respect and fairness.
- strengthening freedom of association: We respect our employee's rights to organise and to defend their interests.
- mutual respect and appreciation: regardless of anyone's age, impairment, religion, social, ethnic or cultural background, gender, sexual orientation and identity, we respect the dignity of each individual and foster diversity and inclusion.
- complying with health and safety regulations: The safety and well-being of our employees rank uppermost in our priorities; this is why we aspire to achieving stringent health and safety standards in the workplace.
- paying appropriate wages: We ensure that our employees receive fair and appropriate pay that enables them to secure their livelihoods.

- minimising environmental pollution: We actively work towards protecting the environment and follow the principle that we can and must minimise our environmental impact and prevent any form of environmental pollution.

### **What we expect from our employees and business partners**

In all our business activities, we are unerringly committed to respecting human rights and the environment and, in doing so, guided by international standards and national laws. The corporate policies and quality management systems that we have established are a reflection of this commitment. These include our Code of Conduct, Supplier Code of Conduct, our Anti-Corruption Policy as well as our audited health and hygiene quality assurance system, GHD, and our ISO 9001 certification. We have also initiated a sustainability system. Detailed information concerning our values, standards, frameworks, and our human rights strategy can be found in our annual sustainability report, which highlights our transparency and openness and documents our ongoing endeavour to promote human rights and environmental protection. It is our expectation that our employees and business partners abide by every law as well as our standards and guidelines. To ensure that this is the case, we have made the binding acceptance of our Supplier Code of Conduct a fundamental prerequisite for any form of collaboration.

### **Measures and responsibilities for human rights and environmental due diligence**

Observing human rights and environmental due diligence across all our business practices and value chains is a matter of special importance to us. To meet these requirements, we implement a number of measures:

#### **Risk management**

To adequately manage risks related to human rights and the environment, the risk management system in place at TOI TOI & DIXI is founded on a holistic concept comprising four consecutive steps: identifying the risks is the foundational step, followed by risk analysis. The identified risks are then evaluated before the relevant measures are initiated. This risk management process applies both to our own company and to our direct suppliers.

#### **In-house**

In-house risk analyses are performed using a risk analysis tool conforming to the German Act on Corporate Due Diligence Obligations (LkDG) through which country, sectoral, product group and sales risks are categorised by risk class.

#### Direct suppliers

We view our direct suppliers in the same way as our own company. Here, too, the risk analysis tool is used to categorise the country, sectoral, product group and sales risks by risk class. The respective risk groups are calculated on the basis of various indices and values that enable risks to be classified as low, medium or high. Where medium-risk and high-risk suppliers are concerned, a detailed assessment is carried out that must be documented in the supplier management system. The detailed assessments enable an overall risk posed by our direct suppliers to be derived which, in turn, forms the basis for creating and implementing preventive and corrective measures. Moreover, case-based risk assessments are conducted and – where required – the necessary preventive and corrective measures derived.

#### Preventive measures

We incorporate the results of our risk analyses into our business processes and our supplier management system. In our own area of business, we have established additional measures regardless of the risk, including publishing this Policy Statement and introducing a binding Code of Conduct for all employees.

Where there is a well-founded suspicion for an infringement or an actual infringement of human rights or environmental standards, we take appropriate corrective action to prevent or end the infringement respectively. This applies to both our own area of business and to our suppliers, from whom we expect to receive their full cooperation. Should corrective measures not be implemented, we reserve the right to take legal action, which may involve terminating the business relationship.

#### Let Us Know whistleblower system

If, in spite of the risk analysis and preventive measures, infringements nevertheless occur, these are reported to a confidential platform. Our company complaints system includes a whistleblowing platform that offers everyone from within or outside the company the opportunity to report any suspected acts of illegal or unethical conduct confidentially and anonymously. All reports are investigated without prejudice and appropriate solutions are effected.

#### Supply chain protection committee

To manage and monitor our duties of care and due diligence, we have established a committee for respecting human rights and the environment (supply chain protection committee) that analyses the findings of due diligence processes at regular intervals, drafts reports and proposes corrective measures.

The effectiveness of our measures to prevent human rights and environmental infringements is subject to continuous review, whereby responsibility for doing so rests with the supply chain protection committee. We gain additional insights through employee surveys that we conduct at regular intervals.

### Regular documentation and reporting

We document the fulfilment of our due diligence obligations on an ongoing basis and store such documentation for at least seven years. Our annual reporting is submitted no later than four months after the close of the respective financial year and is made available to the German Federal Office for Economic Affairs and Export Control (BAFA) and the general public alike. Further information can additionally be found in our annual Sustainability Report, which provides a transparent insight into our efforts to promote human rights and environmental protection.

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