

## **1. Human Rights Strategy of Peek & Cloppenburg B.V. & Co. KG, Düsseldorf**

We, Peek & Cloppenburg B.V. & Co. KG, Düsseldorf<sup>1</sup>, are aware that, as a globally active company, we have a special responsibility towards our employees, the employees of our business partners, our customers and civil society to address compliance with human rights along our supply chain.

We see the multi-layered and complex nature of our supply chains as an opportunity to make a lasting and effective contribution to improving human rights and environmental conditions in cooperation with our business partners. We do not shut ourselves off from the challenges that can arise in connection with these opportunities, but rather want to accept and overcome these challenges.

At Peek & Cloppenburg B.V. & Co. KG, Düsseldorf, we have therefore firmly anchored responsible, sustainable and lawful behaviour as key values in our corporate strategy, for example through our code of conduct for employees, our own animal welfare policy, the rules of procedure for complaint mechanism, our rules of procedure for the whistleblower system INTEGRIS and our amfori membership. As part of our social responsibility, we participate in the amfori Business Social Compliance Initiative ("amfori BSCI"), an initiative to improve social standards in global supply chains. We also utilise the amfori BSCI code of conduct along our supply chain.

We consider the protection of human rights and the environment as one of our core corporate values. We aim to prevent, end or minimise violations or the threat of violations of the following prohibitions (collectively referred to as "human rights and environmental risks") in accordance with the German Supply Chain Due Diligence Act (LkSG):

- Prohibition of child labour;
- Prohibition of forced labour and all forms of slavery;
- Disregard for work safety and work-related health hazards;
- Disregard for freedom of association, freedom of unionisation and the right of collective negotiations;
- Prohibition of unequal treatment in employment;
- Prohibition of withholding an appropriate wage;

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<sup>1</sup> There are two independent companies with the name Peek & Cloppenburg in Germany with their headquarters in Düsseldorf and Hamburg. These are the Rules of Procedure of Peek & Cloppenburg KG, Düsseldorf, whose stores can be found [here](#).

- Destruction of natural resources through environmental pollution; unlawful violation of land rights;
- Prohibition of hiring or using private / public security forces that could lead to impairment due to lack of instruction or control;
- Prohibition of an act or omission in breach of duty that goes beyond the above, which is directly capable of impairing a human rights position in a particularly serious manner and the unlawfulness of which is obvious on a reasonable assessment of all the circumstances in question;
- Prohibited production, use and/or disposal of mercury (Minamata Convention);
- Prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound management of waste containing POPs;
- Prohibited import/export of hazardous waste within the meaning of the Basel Convention.

This policy statement is a core part of our corporate philosophy. We understand that responsibility for a sustainable supply chain is an ongoing learning process, and we are committed to continuously improve.

## **2. Expectations**

We expect our employees and suppliers in the supply chain to respect human rights and the environment and to support us as best they can in order to appropriately prevent the human rights and environmental risks and, if necessary, to end or minimise them; this applies in particular to the priority human rights and environmental risks. In this context, we understand our role to work cooperatively with suppliers in order to appropriately address potential grievances. We explicitly formulate the acceptance of this role in this declaration of principles as our own expectation of ourselves. We consider appropriate compliance with the German LkSG as a guiding principle.

## **3. Risk Management**

We operate a risk management system in accordance with the German LkSG.

Our risk management system enables us to identify and minimise risks relating to human rights and the environment and to prevent, terminate or minimise violations of human rights or environmental obligations if we have caused or contributed to these risks or violations within our supply chain.

The risk management system is anchored in the relevant business processes in particular through the following measures:

- by defining binding responsibilities, such as in particular the establishment of a pluralistic project team, i.e. with persons from different departments such as sustainability, purchasing or compliance, which meets regularly and to the extent necessary to implement the due diligence obligations appropriately;
- by establishing processes, such as in particular a public and accessible complaint mechanism or the flexible and short-term possibility of carrying out risk analyses; and
- by drawing up documents, in particular public rules of procedure for complaint mechanism or code of conducts for our employees and suppliers in the supply chain, in order to define binding expectations towards our employees.

In addition, mechanisms, instruments and processes of the amfori BSCI programme continue to be incorporated into our risk management, for example with regard to our prevention measures, which are described in section 5.

We have also defined a responsibility for monitoring risk management by forming a pluralistically composed control committee. This control committee meets at regular intervals to assess whether appropriate measures are being taken to implement our due diligence obligations.

Our management is informed regularly, at least once a year, about the work of the responsible persons.

#### **4. Risk Analysis and Prioritised Risks**

We carry out annual and occasion-related risk analyses in accordance with the German LkSG. The risks identified are evaluated and prioritised. We communicate the results of our risk analyses to the relevant decision-makers and take them into account appropriately. In our risk analyses, we take into account findings from the processing of information received via the complaints procedure.

The risk analysis procedure is essentially as follows:

- In our own business area, we identify risks specifically using questionnaires that are tailored to human rights and environmental risks and therefore enable us to identify these risks in particular.

The questionnaires are carefully answered by experts from various areas within our own business division. Identified risks are then weighted in accordance with the requirements of the German LkSG and prioritised if necessary due to their scope.

- We determine risks in relation to our suppliers using a multi-stage process. Firstly, direct and, if we are aware of them, indirect suppliers are assessed abstractly according to country and industry-specific risks.

Building on this, a specific assessment and plausibility check of abstractly identified risks is carried out by utilising available sources of information such as media reports. Risks

are then weighted and prioritised, whereby the relevant appropriateness criteria of the German LkSG, in particular our potential ability to exert influence, are also taken into account.

In our risk analysis in our own business area, we were only able to identify very few specific risks that can be assigned to the area of work safety in particular.

Due to the complexity of our supply chains - consisting of a large number of direct or indirect suppliers - it is generally not possible for us to completely rule out risks with our suppliers. We therefore consider all risks relating to human rights and the environment mentioned in section 1 above and in accordance with § 2 of the German LkSG that arise in connection with our business activities and cooperation with our suppliers.

## **5. Prevention Measures**

In order to avoid risks relating to human rights and the environment, we have introduced various preventive measures in our own business area and in relation to suppliers, the effectiveness of which we monitor on an ongoing basis and adapt as necessary.

At present, these preventive measures include the following sets of rules in particular:

- the code of conduct for our own employees
- the supplier code of conduct; and
- the amfori BSCI code of conduct for our production facilities.

We expect all our employees to adhere to the code of conduct for employees.

We are in regular exchange with our suppliers and work together preventively to eliminate grievances.

Our production sites are audited for compliance with social standards and the amfori BSCI code of conduct using the amfori BSCI. Through defined purchasing practices in the onboarding process, we already ensure that we only establish business relationships with audited production facilities. We have defined various criteria that we do not accept and that prevent us from entering into a business relationship with this partner. The criteria cover in particular the "zero tolerance" cases according to the BSCI definition (e.g. child labour, forced labour, inhumane treatment, imminent danger to the safety, life or health of employees or unethical behaviour). Furthermore, we only accept production facilities with an overall audit rating of A (very good) to C (average). A production site with a D-rating (poor) will only be accepted in individual cases on presentation of a specific improvement plan. We do not accept co-operation with production sites with a poorer rating.

We also require our production facilities to comply with the amfori BSCI code of conduct during the onboarding process. The amfori BSCI code of conduct is an essential part of our contractual relationship with suppliers and their production facilities and is a mandatory condition for

entering into a business relationship. In this way, we communicate our expectations regarding human rights and the environment to these suppliers in an unambiguous manner.

Our production facilities also undergo a continuous auditing process via amfori BSCI, whereby the frequency of auditing is largely determined by the last audit rating achieved. If findings arise during these audits, there are clear and binding escalation processes that can lead to the offboarding of the respective supplier and its production site(s).

In addition, amfori BSCI offers regular training courses/webinars and on-site workshops in various sourcing countries, to which our production facilities also have access. Depending on the results of the audit, we also make proactive and specific recommendations to take advantage of such training programmes. In addition to the production sites, our own employees also have the opportunity to take advantage of BSCI training programmes.

If we have substantiated knowledge, we take appropriate preventive measures vis-à-vis the causer, such as the implementation of control measures or support in the prevention and avoidance of a risk.

We review the effectiveness of the preventive measures once a year and on an occasion-related basis, in particular if we have to reckon with a significantly changed or significantly expanded risk situation in our own business area or at suppliers; preventive measures are then updated immediately if required.

## **6. Corrective Measures**

If we identify an actual or imminent violation of an obligation relating to human rights or the environment, we take immediate and appropriate corrective action. If immediate termination, prevention or minimisation is not possible, we draw up a concept with a specific timetable and implement it.

When drawing up and implementing the concept, particular consideration is given to:

- the joint elaboration and implementation of a plan to end or minimise the violation with the company causing the violation,
- joining forces with other companies within the framework of industry initiatives and industry standards in order to increase the ability to influence the causer,
- a temporary suspension of the business relationship during the efforts to minimise risk.

We review the effectiveness of the corrective actions once a year and on an occasion-related basis, in particular if we have to expect a significantly changed or significantly expanded risk situation in our own business area or at suppliers; corrective actions are then updated immediately if necessary.

## **7. Complaints Procedure**

We have set up a system for complaints and notifications of risks relating to human rights and the environment as well as violations of obligations relating to human rights or the environment

that have arisen as a result of our business activities or the business activities of our direct or indirect suppliers. Our complaints procedure is compliant with the German LkSG.

In particular, we provide the following reporting channels for this purpose:

- **Whistle-Blowing portal:** <https://peekcloppenburglksg.integrityline.com>
- **E-Mail:** [lieferketten-compliance@peek-cloppenburg.de](mailto:lieferketten-compliance@peek-cloppenburg.de)
- **Phone:** +49 (0) 162-9522475
- **Mail:** Peek & Cloppenburg B.V. & Co. KG, Abteilung Compliance, Berliner Allee 2, 40212 Düsseldorf
- **Personal meeting** with a member of the Compliance department.

In addition, we have drawn up rules of procedure for complaint mechanism, which enable potential complainants to view the course of the procedure and how their complaint will be handled in advance. The rules of procedure can be accessed on our [homepage](#) in [German](#) or [English](#).

## **8. Documentation and Report**

We document and report in accordance with the German LkSG. In future, we intend to report annually on our measures to fulfil our LkSG due diligence obligations. We intend to publish the reports on our homepage.

## **9. Update**

We regularly update this policy statement and the measures mentioned therein in accordance with the requirements of the German LkSG or other legislations relating to human rights or environmental protection.

Düsseldorf, February 2025

  
Signature of company management