

-English Translation-

# Policy Statement on TOM TAILOR's Human Rights Strategy

Version: 1.0  
Status: Final  
Last reviewed: 02.01.2024  
Current version valid from: 01.01.2024

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### Intro: our commitment to respect human rights and the environment

At the TOM TAILOR Group ("TOM TAILOR"), we recognize fundamental human rights as an integral part of our corporate values. Our human rights strategy reflects our commitment to social responsibility, the protection of human dignity and ethical business conduct. We are committed to respecting and promoting human rights in all our business practices. This applies to our employees, the workers in our value chain, the communities in which we operate and those affected by our business activities.

We are committed to our human rights responsibility as enshrined in the German Act on Corporate Due Diligence Obligations in Supply Chains and the UN Guiding Principles on Business and Human Rights. We support the principles of the Organization for Economic Cooperation and Development (OECD) and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

At TOM TAILOR, we believe that transparency is the basis for acting responsibly. When choosing our partners, we focus on long-term and trusting relationships. It is important to us that all stakeholders - customers, employees and business partners - perceive TOM TAILOR as an organization in which transparency, human and labor rights, diversity, ethical business conduct and responsibility for our actions with regard to people and the environment are an important part of our corporate practices.

This policy statement sets out the overarching principles for the respect and management of human rights due diligence, which we firmly embed in our operating standards and management practices. In addition, we have clear expectations of all our business partners, who must undertake to comply with our [Code of Ethics](#) before working with us. In addition, our suppliers also undertake to comply with the [amfori BSCI Code of Conduct](#) and our [Social Compliance Manual](#) before potentially entering into a business relationship.

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### Scope of application: which areas does the policy statement cover?

This policy statement applies to all activities of the TOM TAILOR Group. In addition, this policy statement sets out the expectations and requirements that TOM TAILOR has

towards all business partners in its supply chain, including suppliers, service providers, platform partners, retailers, consultants, agents and subcontractors.

We expect our business partners - just like TOM TAILOR - to be aware of their social and environmental responsibility and to respect and not violate human rights and environmental rights. TOM TAILOR does not tolerate any kind of human rights violations or actions that would deliberately and recklessly harm the environment - in any of its business areas. We will take all allegations of inadequate respect for human rights seriously and investigate potential and actual human rights violations in order to act accordingly. This process is supported by continuous engagement and collaboration with our stakeholders.

### **Priorities: what do we focus on?**

TOM TAILOR is committed to respecting all human rights and taking responsibility for all our business activities that have an impact on people and/or the environment. We are aware that due to the specific nature of TOM TAILOR's business, certain values, rights and areas of life are potentially at risk, especially in the fashion industry. In particular, we see an increased potential risk for the business areas that take place within the value chain outside the EU.

TOM TAILOR's annual and ad hoc risk analysis records and evaluates suppliers' human rights and environmental risks by country, level in the value chain and weighting within the overall supplier portfolio. At present, all criteria are included equally in our risk assessment.

These criteria include:

- **the right to humane working conditions** (incl. working time regulations, adequate remuneration, compliance with occupational safety and health regulations - in each case as defined in the applicable laws and regulations of the place of employment).
- **protection of the right to equal treatment** (incl. protection against sexual harassment, equal rights for genders, ethnic groups, etc.).
- **prevention of slavery, child labor and corruption.**
- **protection of the environment** (incl. the recording and reduction of greenhouse gas emissions, the consumption of resources such as water and the use of hazardous chemicals).

We are aware that different business areas also entail different risks. We therefore reserve the right to adapt future risk analyses according to the different risk levels and to weight them differently. We will update the risk analysis at least once a year and adjust it in line with developments, both internally and externally.

### **Procedure: our risk analysis and risk management**

We are committed to ensuring ongoing risk-based human rights due diligence throughout

our supply chain, in line with the OECD Guidelines for Responsible Business Conduct. Our approach to due diligence is adapted to take into account the operational context, risks, business relationships and the extent to which we cause, contribute to or are directly linked to adverse human rights impacts. The effectiveness of our measures and interventions is regularly monitored. We also consider feedback as well as qualitative and quantitative indicators from internal and external sources of information.

Risk management at TOM TAILOR is an integral part of the "BE PART" sustainability and responsibility strategy. To implement the legal and internal requirements, we use the "RETRACED" platform to track our entire supplier portfolio and run our risk analysis via the supplier portfolio. In line with industry standards, risk management is divided into five overarching steps:

1. **framework:** embedding a definition of human rights standards and expectations in our operations and value chain and clarifying and monitoring communication to all responsible and affected parties regarding their effectiveness.
2. **analyzing:** identifying and analyzing supplier risk based on volume, location and industry-specific human rights and environmental risks.
3. **prioritizing:** prioritizing industry and supplier risks based on risk analysis and risk profiles to define appropriate risk management measures.
4. **managing:** ensuring that standards and expectations are met and implementing preventative and remedial actions.
5. **reporting:** documenting and reporting on measures and their progress in accordance with applicable due diligence requirements.

These steps are implemented through appropriate programs and processes. In addition, we are committed to providing suitable complaint mechanisms for employees, business partners and all other internal or external stakeholders. For example, we have introduced a feedback hotline for all direct suppliers, which is communicated to workers in the local language and in English via a notice board at each factory. We have also set up an established whistleblowing procedure. Details of our established complaints procedure can be found in our [Code of Procedure](#).

We strive to increase the awareness and knowledge of our employees and business partners on human rights issues and encourage them to raise their concerns without fear - anonymously if they wish.

#### **Governance: how do we monitor and communicate progress?**

This policy statement has been approved by the TOM TAILOR Management Board. Responsibility for implementation is delegated to the Human Rights Officer (HRO), who leads the Sustainability & Corporate Responsibility Team. The HRO will report regularly on

progress and impact to the Executive Board and the Management Team. The HRO and the Sustainability & Corporate Responsibility Team work closely with the legal department and the local CSR managers on an ongoing basis.

Our approach to human rights management is regularly assessed and reviewed. We strive for continuous improvement and seek insights and challenges from both internal and external experts. This policy statement is made publicly available and communicated to both employees and business partners. Our performance and impact on human rights are publicly reported, including our annual report on the fulfillment of our human rights due diligence obligations (starting 2025). Complaints can be submitted anonymously via our trusted lawyer ombudsmann@thielvonherff.de or by email to BEPART@tom-tailor.com.

\*German version signed on 05.01.2024 in Hamburg by

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