# Policy Statement

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| Responsible for guidelines: | Compliance Department (CDS) of the ECE Group Services GmbH & Co. KG in Hamburg |
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# Policy Statement of ECE Marketplaces GmbH & Co. KG

For the ECE Group, respecting and safeguarding human rights is an indispensable part of responsible corporate governance.

The ECE Group comprises ECE Group GmbH & Co. KG and its subsidiaries within the meaning of Section 290 (1) and (2) HGB. ECE Marketplaces GmbH & Co KG is part of the group of companies and, due to its number of employees, is obliged to comply with the provisions of the German Supply Chain Act (LkSG).

"We" within the meaning of this policy statement therefore refers to ECE Marketplaces GmbH & Co.

## 1 INTRODUCTION AND HUMAN RIGHTS STRATEGY

Responsible, sustainable and lawful action is one of the ECE Group's core values and is therefore also firmly anchored in the corporate strategy of ECE Marketplaces GmbH & Co KG. This includes appropriate compliance with the human rights and environmental due diligence obligations of the Supply Chain Act (LkSG) so that violations or imminent violations of the following prohibitions are prevented, stopped or minimized (together "human rights and environmental risks"):

- Prohibition of child labor;
- Prohibition of forced labor and all forms of slavery;
- Disregard for occupational health and safety and work-related health hazards;
- Disregard for freedom of association, freedom of association and the right to collective bargaining;
- Prohibition of unequal treatment in employment;

- Prohibition of withholding an appropriate wage;
- 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 impairments 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 handling of waste containing POPs;
- prohibited import/export of hazardous waste within the meaning of the Basel Convention.

# 2 EXPECTATIONS

In line with the LkSG, we expect our employees and suppliers in the supply chain to respect human rights and the environment and to provide us with the best possible support in order to appropriately prevent the human rights and environmental risks described in the LkSG and to end or minimize violations; this applies in particular to the priority human rights and environmental risks. These expectations are expressed for employees, for example, in the Code of Conduct and for suppliers, for example, in the compliance standards for business partners. In addition, we express our expectations through further-reaching preventive and remedial measures (see below).

# 3 RISK MANAGEMENT

We have a risk management system within the meaning of the LkSG.

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

We have also defined a responsibility for monitoring risk management by appointing a human rights officer who, in this role, reports directly to the management of ECE Marketplaces GmbH & Co. KG and, in collaboration with cross-functional teams, designs and validates the preventive and remedial measures required to achieve the objectives.

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

When setting up and implementing our risk management system, we have taken appropriate account of the interests of our employees, the employees within our supply chain and those who may otherwise be directly affected in a protected legal position by our economic actions or the economic actions of a company in our supply chain.

# 4 RISK ANALYSIS AND PRIORITY RISKS

We fulfill our obligation to respect and uphold human rights through, among other things, regular risk assessments and due diligence checks, or when there are grounds for suspicion

We carry out annual and ad hoc risk analyses in accordance with the LkSG. The risks identified are evaluated and prioritized. We communicate the results of our risk analysis 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.

# 5 PREVENTIVE MEASURES

In order to avoid human rights and environmental risks, 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 adjust as necessary.

We expect all our employees to adhere to the ECE Group Code of Conduct. To this end, we regularly train our employees on the content of the Code of Conduct.

We expect our suppliers to comply with our human rights and environmental expectations. To this end, we have compliance standards for business partners.

If we have substantiated knowledge, we take appropriate preventive measures vis-à-vis the originator, such as implementing control measures or providing support in preventing and avoiding a risk or implementing industry-specific or cross-industry initiatives that we have joined

We review the effectiveness of the preventive measures once a year and on an ad hoc basis, particularly if we have to expect a significantly changed or significantly expanded risk situation in our own business area or at suppliers; preventive measures are then updated immediately if necessary.

# 6 REMEDIAL MEASURES

If we identify an actual or imminent violation of human rights or environmental obligations, we take appropriate remedial action without delay. If immediate termination, prevention or minimization is not possible, we draw up a concept with a specific timetable and implement it.

Particular consideration is given to the creation and implementation of the concept:

(1) the joint development and implementation of a plan to end or minimize the breach with the company that caused the breach,

(2) joining forces with other companies as part of industry initiatives and industry standards in order to increase the ability to influence the polluter,

(3) a temporary suspension of the business relationship during efforts to minimize risk.

To date, we have not identified any imminent or actual violations of human rights or environmental risks and have therefore not yet had to take any remedial action.

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

# 7 COMPLAINTS PROCEDURE

We have set up an LkSG-compliant system for complaints and information on human rights and environmental risks and violations of human rights or environmental obligations arising from our business activities or the business activities of our direct or indirect suppliers.

Complaints and information can be submitted directly to the Compliance Department of the ECE Group - by telephone or e-mail at

**Compliance-Helpline:**
**Tel.: +49[40] 60606 - 7733**
**E-Mail: compliance@ece.com**

The ECE electronic whistleblower system can be accessed via the following Internet address:

https://www.bkms-system.net/ECE. The system allows whistleblowers to submit reports either anonymously or by stating their identity.

# 8 DOCUMENTATION AND REPORT

We document and report in accordance with the LkSG.

# 9 UPDATE

We regularly update this policy statement, and the measures specified therein in accordance with the requirements of the LkSG.

Hamburg, January 2025

The Management Board of ECE Marketplaces GmbH & Co. KG