



OBI Code of Conduct for Business Partners

The OBI Group, consisting of OBI Group Holding SE & Co. KGaA ("OGH") and all companies in which OGH, directly or indirectly, is a majority shareholder or over which it can otherwise exercise a controlling influence (hereinafter referred to as "OBI"), is an internationally operating trading company in the DIY sector. Compliance with the law, integrity and sustainability are deeply rooted in OBI's corporate culture.

OBI expects all business partners to act with the same commitment to human and environmental rights. To OBI, respect for internationally recognized human rights and protected environmental rights is the basis of all business relationships. The principles formulated in this Code of Conduct for Business Partners of OBI ("**Code of Conduct**") form the basis for the selection of business partners and the ongoing evaluation of business partners at OBI. This Code of Conduct applies worldwide and is aimed at both manufacturing suppliers and service providers of all kinds, including consultants, intermediaries, lessors and other business partners (hereinafter collectively referred to as "**Business Partners**"). It is a binding component of all contracts between OBI and its business partners.

1. Compliance with laws and regulations

OBI's business partners comply with all applicable laws, rules and regulations in the countries in which they operate and take appropriate measures to ensure compliance with these laws, rules and regulations in their company and in their upstream supply chains.

In particular, without limitation, the business partners shall comply with the laws, legal provisions and universal rights summarized below.

Corruption and property offenses

OBI rejects any form of corruption, bribery, embezzlement, fraud, theft, misappropriation or blackmailing. OBI expects that its business partners do not use, approve or accept such practices. The business partners, including their representatives, must in particular comply with the applicable anti-corruption laws in Germany and abroad. They shall not offer, give or accept bribes or other illegal payments, inducements, gifts, favors or other illegal advantages or benefits in connection with OBI's business activities.

Fair and free competition

OBI's business partners respect fair and free competition and comply with the laws that protect and promote it, in particular the applicable antitrust laws. They do not enter into any anti-competitive agreements with competitors, other business partners or



customers, do not unlawfully exchange any information relevant to competition and do not abuse any dominant or comparable market position that may exist.

Money laundering and financing of terrorism

OBI's business partners shall ensure that the applicable provisions for the prevention and detection of money laundering and financing of terrorism are complied with. They process transactions, keep financial records and prepare annual financial statements and other financial reports in accordance with the applicable laws.

Export control, customs duties and sanctions control

OBI's business partners comply with all regulations for the import and export of goods, services, technologies and information. They fulfill the obligations of customs and foreign trade laws in all countries in which they do business. In addition, they observe the currently valid sanctions regulations and sanctions lists insofar as they affect business activities with OBI.

Data protection

OBI's business partners observe the applicable laws on the protection of personal data, conclude the necessary agreements and create the personnel and technical requirements for compliance in their respective areas of activity.

Protection of information, trade secrets and intellectual property

OBI's business partners shall respect and protect the intellectual property of OBI and third parties, including know-how, patents, trademarks, utility and design patents and trade and business secrets, to the extent agreed in each case and in accordance with the applicable legal provisions. They shall keep confidential information safe and protect it from unauthorized access in accordance with the applicable regulations and recognized standards. They are obliged to keep confidential all non-public information they become aware of directly or indirectly in the course of their business relationship with OBI. They shall use confidential information exclusively for the contractually agreed or intended purpose.

2. Human rights / fair and safe working conditions

To OBI, respect for internationally recognized human rights, as protected by section 2 subsection 2 of the German Act on Corporate Due Diligence Obligations in Supply Chains (*Gesetz über die unternehmerischen Sorgfaltspflichten zum Schutz der Menschenrechte in Lieferketten*, "LkSG") is the basis for all its actions. This is

- compliance with the prohibition of child labor,
- compliance with the prohibition of human trafficking, slavery and other forms of forced labor,
- ensuring occupational health and safety,
- respect for the freedom of association,
- the non-discriminatory treatment of employees,
- the provision of appropriate working conditions for employees, including appropriate remuneration and the maintenance of employability,
- the prevention of the unfair use of private or public security forces for business purposes,
- the protection of the rights of indigenous peoples and the prohibition of unlawful land grabbing,
- Avoiding the impairment of a healthy livelihood through environmental damage,
- responsible consumption of resources, especially energy, water and natural resources,
- responsible management of emissions to water, air and soil,
- responsible handling of waste, in particular chemicals that are harmful to health and the environment, and storage and disposal in accordance with applicable laws and international agreements.

Prohibition of child labor

The minimum age for admission to employment in accordance with the applicable legal regulations must be observed. If there are no national legal regulations, Convention 138 of the International Labor Organization (ILO) applies as a minimum. According to this, the direct or indirect employment of children under the age of 15 is not permitted. Employees under the age of 18 shall only carry out work in accordance with the legal requirements of their country of employment, in particular with regard to working hours and conditions and taking into account the overriding interest in education and qualification.

Prohibition of slavery and forced labor

OBI does not tolerate slavery or forced labor - in any form whatsoever - or human trafficking in its supply chain. Nor does OBI accept debt or contractual bondage or involuntary prison labor. Labor must always be voluntary. OBI further expects that its business partners will not withhold personal property, passports, wages, training certificates, employment or other documents of their employees, unless this is necessary for the execution of the employment relationship and permitted by applicable



law. OBI does not accept goods that have been produced by exploiting slavery, forced labor or servitude and is entitled to refuse acceptance of such goods as contrary to the contract, even if the goods otherwise have the agreed quality.

Occupational safety, health and safety standards

OBI's business partners comply with occupational health and safety regulations, in particular to prevent accidents at work or work-related health hazards. They implement the necessary safety standards and protective measures, including equipment and training. OBI's business partners ensure safety and health protection at the workplace at least within the framework of the applicable laws and document these properly. In the event of occupational accidents, health hazards and work-related illnesses, OBI's business partners shall immediately take adequate corrective measures.

Freedom of association

In accordance with the law governing the place of employment, the business partners respect the right of their employees to decide freely and without discrimination, threat, intimidation or other retaliation to join or form a trade union or employee representation of their choice and they respect the free activity of trade unions, in particular the right to strike and the right to collective bargaining.

Prohibition of discrimination

OBI expects that its business partners do not discriminate, promote or tolerate discrimination or unequal treatment in their own business area, in particular on the basis of national or ethnic origin, social origin, race, religion or ideology, political opinion, sexual orientation, trade union activity or on the basis of age, health, gender or disability. This applies to the access to employment as well as working conditions and promotions.

Violence or harassment in the workplace

OBI does not tolerate violence in the workplace, neither in its own business area nor in the supply chain. This includes direct or indirect threats, intimidation, physical attacks or psychological violence, e.g. in the form of bullying or insults. OBI rejects any form of sexual harassment. This applies both to our own staff and to external personnel.

Fair pay and working hours

OBI's business partners shall ensure that their employees are remunerated appropriately, at least in accordance with the statutory minimum wage provisions of the place of employment, as well as appropriate working hours and sufficient rest periods, including vacation. If there are no corresponding regulations, the remuneration is based on the industry-specific, locally customary remuneration and benefits.

Unlawful eviction or land confiscation

Business partners shall recognize and respect the existence of land use and customary rights and all related rights within local communities, including the rights of indigenous peoples and individuals. During acquisition, development or other use of land, forests and waters whose use secures a person's livelihood, business partners shall refrain from unlawful forced evictions and comply with the prohibition of the illegal seizure of land, forests and waters.

Deployment of security forces

Private or public security forces may only be deployed for business purposes if this does not result in abuse and neither endangers the life and limb of employees nor unfairly prevents the assertion of other employee rights.

3. Environmental protection

OBI's business partners ensure compliance with the environmental and energy laws applicable to them, use natural resources sparingly and minimize the environmental impact of their production processes and products. They make a contribution to reduce emissions as well as energy and water consumption. They ensure compliance with the legal requirements for waste disposal and for the storage and handling of hazardous substances. In addition, the international conventions of Minamata, Stockholm and Basel must be complied with.

4. Product conformity and safety

The products sold by OBI must comply with the applicable legal and official regulations as well as OBI's internal standards. This presupposes that OBI's business partners develop, manufacture and supply products that comply with the current legal requirements for product integrity, conformity and safety. OBI's business partners shall comply with the applicable product safety, regulatory and technical regulations and requirements in the country of manufacture, assembly and use, in particular with the applicable laws regarding the safety, labeling, packaging and disposal of products and the use of hazardous substances and minerals. They ensure that all products and services meet the contractually agreed criteria for product conformity, safety and quality upon delivery and can be used safely for their intended purpose.

5. Compliance with the Code of Conduct by business partners

Obligation of the business partners

OBI's business partners undertake to comply with the provisions of this Code of Conduct. They shall ensure that their employees and other representatives are aware of the principles of conduct set out therein and are supported in acting in accordance



with them. If a business partner violates the human rights and environmental requirements specified in the LkSG, it is obliged to take immediate measures to prevent, end and minimize these and their negative effects.

OBI expects its business partners to make all reasonable best efforts to ensure compliance with the principles and obligations set out in this OBI Code of Conduct for Business Partners by its direct and indirect suppliers and other business partners.

Control mechanisms

Business partners shall support OBI to a reasonable extent in implementing the principles of this Code of Conduct. This includes, for example, the prompt and truthful transmission of information, e.g. in the form of self-assessment questionnaires. OBI reserves the right to inspect business partners regularly or on a case-by-case basis with regard to compliance with the law and the principles of this Code of Conduct, either itself or through external experts. OBI will take into account the legitimate confidentiality interests of the business partner in each inspection and will not interfere with business processes as far as possible.

Each business partner is obliged to provide OBI with an e-mail address and telephone number where any (ad hoc) questions regarding compliance with the Code of Conduct can be clarified.

Training and further education

OBI's business partner shall regularly train its managers, employees and representatives with regard to the human rights and environmental requirements of the LkSG. If OBI's business partner is a company outside the legal scope of the LkSG, OBI may support the business partner in carrying out the training, for example by offering the opportunity to participate in OBI's training measures.

Measures in case of violation

OBI considers compliance with the principles contained in this Code of Conduct to be essential for the respective contractual relationship. If a business partner significantly violates the principles and obligations contained in this Code of Conduct, OBI shall be entitled - without prejudice to any other rights and remedies - to terminate the business relationship with the respective business partner by extraordinary termination in accordance with the statutory provisions applicable to the contractual relationship (in particular with regard to setting deadlines and warnings). In such a case, it is at the discretion of OBI to waive termination and to instruct the business partner to immediately create and implement a concept to end or minimize the violation and to avoid future violations. In the event of a violation or suspicion of a violation, OBI is free to temporarily suspend the business relationship.



Complaints mechanism

OBI encourages any person to report any violations of the provisions of this Code of Conduct openly or anonymously using OBI's whistleblower system:

www.bkms-system.com/OBI

or:



All violations of this Code of Conduct that have occurred in OBI's own business area or at a direct or indirect supplier of OBI can be reported.