



a company of  
**Groupe SEB**



# POLICY STATEMENT ON HUMAN RIGHTS

## Foreword



From left to right: Oliver Kastalio, Bernd Stoeppel, Dr. Stefanie Leiterholt, Dr. Clemens Wöhrle

The brands of WMF stand for the very best in cooking, drinking and eating for more than 165 years. Every day, over 100 million people around the world use WMF, Silit and Kaiser products to prepare, cook, bake, eat and drink. And when they're not doing that, they're enjoying coffee specialities and meals prepared by the hospitality industry using products from WMF, Schaerer, Curtis or Hepp. Our employees are passionate about bringing people together – whether at home, out and about or in upscale restaurants – to give them shared moments that are as precious as they are delicious. And they do this with products that are outstanding in design, perfect in function and excellent in quality, making every culinary experience a true pleasure. Our company has a long tradition, having been founded in Geislingen an der Steige in 1853, and became part of the French Groupe SEB in late 2016.

Today, Groupe SEB is the world's leading supplier of small household appliances, with more than 33,000 employees in 150 countries and top brands such as Tefal, Rowenta, Krups, WMF, Supor, Imusa and All Clad. Our mission is to develop and offer solutions to consumers around the world that improve their daily lives. Thus, we have a great responsibility to manufacture our products under ethical conditions.

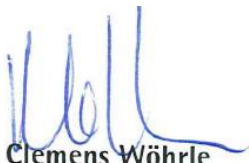
For us, there is no doubt that we can only be successful in the long run if we live up to our corporate responsibility to respect human rights at both local and the global level. This policy statement is another important step in this direction. It is up to each and every one of us to put this policy statement into practice and lead our company towards a sustainable future in every respect.




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 Managing Director Finedining Topco GmbH  
 Member of the Executive Committee of Groupe SEB



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 President Operations WMF GmbH



**Dr. Stefanie Leiterholt**  
 President Human Resources WMF GmbH

## **Commitment to global standards**

The success of Groupe SEB, and by extension of WMF<sup>1</sup>, is based in no small part on the trust placed in us by our internal and external stakeholders around the world. This trust is closely linked to the way we conduct business with our various partners. The most important ethical requirement is that we apply the applicable laws in the countries where we operate. We are signatories to the United Nations Global Compact and the APPLiA Code of Conduct<sup>2</sup>. Our support for human rights is based on the principles of the United Nations Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles), the OECD Guidelines for Multinational Enterprises and the Fundamental Conventions of the International Labour Organization (ILO).

## **Anchored at the top management level**

Our commitment to responsible environmental, social and governance practices, and thus the implementation of this policy statement, is driven by the top management and is an essential component of our Group's strategy. The Board of Directors is regularly informed about this policy and the Governance and Remuneration Committee is responsible for monitoring it.

For the purposes of a holistic risk management approach and to address internal and external risks and uncertainties, Groupe SEB has set up a Compliance Committee tasked with identifying, quantifying, preventing and controlling these risks as far as possible. The committee meets two to four times a year to review the measures taken, discuss any problems encountered and draw up plans for remedial action.

## **Our risk management approach**

Our approach to protecting and respecting human rights is holistic in nature. We systematically identify, assess and prioritise risks so that we are able to plan and implement appropriate preventive measures in the relevant areas. In the event of a violation, there are processes in place that allow us to respond as quickly as possible. We monitor the effectiveness and success of our actions and continuously improve our processes and measures based on the insights gained. Throughout these steps, we take the interests of our employees and other stakeholders who may be affected by our business activities into account. Internal and external stakeholders can submit complaints about our company through various channels. We report on our activities on a regular basis.

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<sup>1</sup> WMF in this context means Finedining Topco GmbH, WMF GmbH and all affiliated companies over which they exercise a decisive influence. Any reference to Groupe SEB in this policy statement also covers WMF and its affiliates.

<sup>2</sup> Home Appliance Europe (formerly CECED: European Committee of Domestic Equipment Manufacturers).

## Identification of risks

Our risk identification and risk control methodology also covers risks related to ethical, social, occupational and environmental factors. As part of this process, internal audit interviewed the heads of departments in all of the Group's business units in order to identify these risks and integrate them into the company's overall risk map. This overview is updated every year, validated by the Executive Board and communicated to the Audit and Compliance Committee. As Groupe SEB, we operate in almost 150 countries in a variety of complex economic and socio-cultural environments. The risks identified are closely related to the business activities of our company, but also to the countries in which our subsidiaries and suppliers operate. Based on this framework, employee health and safety as well as respect for human rights aspects are considered and reflected into the priority risks.



## Global values for all employees and business partners – the Code of Ethics

In 2012, we drew up a [Code of Ethics](#) to formally set out our corporate policy and ethical values on an international level. Our Groupe SEB Code of Ethics defines the main rules of conduct that ensure compliance with ethical principles in line with our values. Against the background of our external growth, as reflected in the integration of new companies into our Group, the Code of Ethics provides a common reference system to guide all these new entities in their actions. The document was developed with input from employees in different professional fields and different geographic regions and is directed at all employees to help them make the right decisions, regardless of location and circumstances. Through our Responsible Purchasing Charter, we also commit our suppliers to the content of the Code of Ethics.



We have translated the Code of Ethics into the Group's eleven main languages and distributed it to all employees. To make sure that all employees understand the key concepts of the Code of Ethics and know what to do in the event of an ethical dilemma, we have been running an extensive training programme since 2018. We wanted the training to be as practice oriented as possible. Therefore, we developed it together with the different departments of the Group: Sustainable Development, Training, Human Resources, Quality Standards and Environment, Internal Audit, Purchasing, Legal, Health and Safety. The programme is part of the compulsory training for new employees. In addition, there is an annual refresher course.

### **People count**

Our global human resources policy is based on the Group's values: entrepreneurship, passion for innovation, team spirit, professionalism and respect for people. It builds on key priorities such as respect for human rights, skill development, health and safety in the workplace, dialogue between employees and management, diversity and equality.

The resulting expectations of our managers are set out in the Leadership Competency Model, which is based on the Group's values and written in a language that everyone can understand. It is formally integrated into the annual appraisal process. We have also included it in our leadership training programmes and adopted it as a benchmark for assessing the leadership competencies of external and internal candidates for recruitment or internal transfers. The Group organises regular workshops to help managers implement this model on a daily basis.

### **Zero tolerance for child or forced labour**

Forced or compulsory labour of any kind is prohibited in all our companies and will not be tolerated among our business partners. In addition, we have committed ourselves to combating illicit work (undeclared employment). We do not tolerate child labour. Regardless of the country, we do not employ workers under the age of 15, even if local legislation specifies a lower age limit. Our suppliers must commit to this as well. We always comply with local laws and never assign work to young people under the age of 18 that could endanger their health or safety.

### **Success through diversity**

At Groupe SEB, we see diversity as a source of energy, creativity and innovation, and as an asset to our business. We encourage initiatives that enhance the diversity of our teams in all respects: equal opportunities for women and men, ethnic and social heterogeneity, jobs for people of all ages as well as inclusion of people with disabilities. In 2021, we became a signatory to the Diversity Charter and adopted an anti-discrimination policy. We have made diversity and gender equality a priority and have set ambitious Group targets, for example regarding the proportion of female managers, which we manage through key performance indicators. And we have also stepped up our efforts in other aspects of diversity, such as equal opportunities (social and generational diversity), disability and cultural diversity. Our work in these areas is based on Group-wide action plans that focus in particular on the following topics: recruitment and inclusion, equal pay, work-life balance, training and initiatives to raise employee awareness, career management, leadership and management practices, internal communications and promotion of employee engagement.



### **Right to health and safety at work**

Employee health and safety is one of the most important concerns for Groupe SEB. With almost 33,000 employees around the world, occupational accidents are an ever-present risk that affects the entire workforce. Our 38 plants around the world expose us to industrial risks (fire, accidents, pollutant emissions) that can affect the health of our employees as well as the environment. Since the Group operates in almost 150 countries, our employees are also exposed to safety risks, such as work in risk countries, business trips or sudden geopolitical changes, to name only a few.

We continuously develop measures to reduce the number of workplace accidents and occupational illnesses. In the process, we set ourselves ambitious targets, which we regularly review and control using key performance indicators. These actions are driven by the highest level of management through a Health and Safety Steering Committee, which includes several members of the Group's governing body. Our health and safety policy is backed by a global network of 35 environmental, health and safety coordinators across all plants and logistics sites in 13 countries.

We make sure that our safety standards and accompanying recommendations are implemented worldwide. All our companies are certified in accordance with the ISO 45001 standard. We have formalised our minimum requirements, which go beyond compliance with national and international regulations. These standards are integrated into our safety management procedures, are written in English, French and Chinese, and apply to all teams worldwide. Some standards concern the organisation and management of safety, while others are aimed at preventing specific risks. Internal audits are conducted to ensure that they are applied in practice. We continuously update our health and safety standards and guidelines to incorporate new findings.

Our approach to safety is reflected in the global Safety in SEB programme, which places particular emphasis on involving employees as contributors to their own safety. We have six golden rules for safety, which are available in ten languages and are systematically communicated throughout the Group. Safety-specific checkpoints are built into the safety pyramid – a tool that helps identify dangerous situations early on and remedy them quickly to prevent the risk of accidents. Appropriate training is available to our employees depending on their place of work; in areas of the company where the risk is higher, we provide more targeted and intensive training. All accidents that occur within our company are summarised in a monthly newsletter, which also contains action plans and is sent to all managers (including the Executive Board). At the sites with the highest rates of workplace accidents, we offer more comprehensive support and guidance. In 2021, we held the inaugural International Health and Safety Awards, recognising the best projects across the company.

Our international health plan, Health in SEB, started with an analysis of all plants to identify the main health risks. This inventory served as the basis for drawing up Group standards and establishing health targets along with indicators to monitor progress, for example on the topic of ergonomics in the workplace.

### **Dialogue between employees and management**

At Groupe SEB, we respect freedom of association worldwide and promote social dialogue between employees and management in our subsidiaries, both on an individual and a collective basis. We are also committed to establishing employee representation in all countries in which we operate – a commitment we have reaffirmed in our Code of Ethics. There is a European Works Council with workers' representatives from 14 countries in the European Union and the United Kingdom.

### **Reasonable wages and working hours**

Groupe SEB subscribes to a fair and transparent remuneration policy that is understandable to all. We are committed to paying wages that are in line with the applicable regulations and minimum industry standards in each country that allow our employees to meet their basic needs and benefit from disposable income.

Despite the diversity of our sites and local working time regulations, Groupe SEB strives not to exceed 48 hours of work in a normal working week or 60 hours of work including overtime. Moreover, each employee must have at least one day off per week, save in exceptional cases explained in the Group's Code of Ethics. Groupe SEB is actively working to achieve these objectives, particularly in its Chinese factories.



## Human rights and the environment

At Groupe SEB, we recognise our responsibility to protect the environment and are aware of the potential impact of our products, production and purchasing processes on the environment and people. Therefore, in addition to respecting human rights, we also observe environmental due diligence obligations within our Group and require our suppliers and business partners to do the same. Our expectations in this regard are anchored in our Code of Ethics and our Responsible Purchasing Charter. We have also defined clear environmental standards and targets for our company, which we monitor and control by means of key performance indicators. With a global environmental management system, we aim above all to prevent pollution, limit the use of resources (energy and water) and reduce waste. Environmental coordinators in all divisions of the company are responsible for implementing and monitoring this system. We are certified in accordance with ISO 14001, encourage our suppliers to obtain this certification as well and to continuously improve their environmental performance.

Preventing air, soil and water pollution is an important pillar of our environmental policy in order to preserve the ecological balance around our sites. We have strengthened our tools in this area by introducing a uniform environmental risk assessment methodology for all of the Group's sites and establishing a common standard for emergency action. All environmental risk analyses are put into a central database, providing a comprehensive overview at Group level and simplifying the exchange of information between the sites.

We combat the depletion of natural resources in several ways. One, we limit the amount of water, energy and raw materials used to make our products. And secondly, we place our products and services at the heart of the circular economy by prolonging the life of products and reusing them, promoting recycling and the use of recycled materials, and trialling product sharing.

To help our suppliers comply with regulations prohibiting the use of hazardous substances, Groupe SEB has partnered with an external provider specialising in the maintenance of technical, regulatory and environmental data. Our suppliers can access a dedicated Internet portal that assists them in preparing their environmental declarations. In anticipation of future regulatory changes, we will continue our efforts to monitor certain substances.



## Relationship with our suppliers

In line with the UN's sustainable development objectives, at Groupe SEB we have a great responsibility to ensure that our products are manufactured under ethical and sustainable conditions. In this context and in line with our Sustainable Development strategy "Act for Sustainable deliveries", the Purchasing department is conducting a responsible purchasing strategy including various reporting and monitoring systems: From the definition and constant re-evaluation of this responsible purchasing strategy, to the monitoring of ESG<sup>3</sup> initiatives and activities in Purchasing, to the deployment of its pillars to the ecosystem (purchasing community and suppliers) and the monitoring of risks and compliance. The objective is to strengthen the collaboration with our suppliers worldwide on ESG issues in order to reduce our environmental impact and have a positive social impact.

Our purchasing policy includes the following components and is managed and executed both on Group as well as operational level with aligned responsibilities:

- Identification of ethical, social and environmental risks per purchasing category and annual supplier risk analyses
- Our [Responsible Purchasing Charter](#)
- Pre-screening of suppliers
- Ethical, social and environmental audits

We implement and continually improve this policy at two levels. At Group level, the purchasing department organises information and training sessions such as webinars on responsible purchasing for its entire community. Twice a year, it presents the progress of the Responsible Purchasing Roadmap and launches different initiatives. In the operational units, the purchasing staff are responsible for managing supplier relationships: they take care of the pre-screening of suppliers, ensure compliance with the Responsible Purchasing Charter, ensure that the social, ethical and environmental audits of the suppliers in the yearly audit plan are conducted without any issues, and train suppliers.

The identification of ethical, social and environmental risks per purchasing category is the basis for defining appropriate measures. This analysis is currently renewed with the support of an external provider. It is used within Groupe SEB to draw up concrete action plans to progress on the social, ethical and environmental aspects of purchasing and to further develop our risk management. For existing suppliers, we carry out an annual risk analysis, which is based, among other things, on the results of social, ethical and environmental audits as well as the suppliers' compliance with specified regulations. The results of the analysis are followed up every quarter and, depending on the risk assessment, regular meetings are held to discuss further steps.

Groupe SEB's Responsible Purchasing Charter is based on our Code of Ethics and Responsible Purchasing Policy. It is available in ten languages. In this document, we reaffirm our requirements as well as mutual rights and obligations regarding respect for human rights and ethical, social and environmental principles. The charter serves as a common frame of reference for our purchasing teams and suppliers and is supposed to ensure that the Group's fundamental values are applied in our purchasing activities and considered as critical drivers of success and performance. We call on our direct suppliers to comply with our standards on human rights and working conditions and to

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<sup>3</sup> ESG = environmental, social, governance

communicate them to their employees, as well as to carry them into their upstream supply chains and monitor compliance there.

We subject each new supplier of raw materials, components or finished products to a rigorous pre-screening process, which is carried out under the supervision of the responsible buyer. Social and environmental criteria play an important role in this screening – in particular relating to requirements for good working conditions, human rights compliance, environmental protection and safety – and have an impact on our decision to approve the supplier. New suppliers based in risk countries<sup>4</sup> must additionally pass an ethical, social and environmental audit before being approved.

Every year, we carry out an audit campaign to identify shortcomings and correct them through concrete action plans. For the sake of transparency, we have drawn up an ethical, social and environmental interview guide for our suppliers. The Group offers training on social and environmental issues to suppliers to help them make progress in these areas. The group compliance manager and purchasing referent oversee the execution of the audits and monitors the suppliers' progress plans with the support of the social audit leaders. A recognised global external provider assists us in conducting these audits. Our ethical, social and environmental audits encompass all categories of suppliers. The audits usually take place at least every three to four years. A particular emphasis is on audits in risk countries as well as audits based on predefined priority criteria. In the event of audit findings, we plan follow-up audits to monitor the implementation of corrective actions.

A single violation (e.g. non-compliance with the legal working age) triggers the following zero-tolerance actions: a formal letter from the purchasing director or head of procurement urging the supplier to implement a plan to remedy the problem within two weeks, an immediate suspension of all new business activities and a follow-up audit one month later to check whether the problem has been solved. If this is not the case, the Group will decide to terminate the partnership.

### **Complaints procedure**

Employees and external third parties can bring suspected human rights violations to our attention and call for remedial action through various channels. Such channels include, in particular, our whistleblower systems as well as employee representatives.

We have set up an external whistleblower system specifically for WMF and its affiliated companies. It can be accessed either internally via the Compliance website on the intranet or externally via the [Compliance/Whistleblowing link](#) on all (brand) websites of WMF. The websites explain the process in text form, provide details on how to contact the company by email, telephone or via a certified online tool (anonymous contact is possible) and specify the responsible person. The [commUNITYcate tool](#) is available in eight languages, including Chinese and Czech. The lawyer in charge of the procedure guarantees objectivity. He is impartial, not bound by any instructions from WMF and sworn to secrecy. The complaints procedure thus allows the identity of the complainant to remain confidential if necessary, ensuring effective protection against discrimination or punishment as a result of the complaint.

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<sup>4</sup> Risk countries as defined by amfori/Business Social Compliance Initiative – Country Risk Classification, 2022

As part of our measures to ensure that the obligations of the Code of Ethics are properly implemented, we have also set up a whistleblower system for Groupe SEB as a whole, enabling any employee or any person outside the Group to report situations that violate the code. The system is also shared with suppliers through the Responsible Purchasing Charter and a clause in their contracts upon renewal. A process governs the procedure for making a complaint, identifies people to contact, specifies information that must be provided and how reports will be handled, outlines confidentiality rules and ensures protection for whistleblowers. The process is explained in the Code of Ethics as well as in the Code of Ethics training programme and is made available to employees on the Group's intranet. All reports are analysed and followed up. The various points mentioned in the Code of Ethics are included in the internal audit manual and reviewed during on-site audits.

### **Adoption**

This policy statement has been adopted by the management of Finedining Topco GmbH as well as WMF GmbH and the responsible representatives of top management as a binding framework within WMF (worldwide) for implementing the core elements of human rights due diligence. The principles laid down herein apply to all managers and employees of WMF worldwide. The document lists contact persons to whom business partners, customers and employees can turn in individual cases.

### **Communication and continuous development**

We make this policy statement available to all our employees and external third parties in an appropriate form and have it published. We regularly inform our employees about the content and progress of our global initiatives for human rights and environmental standards. The policy statement is reviewed and revised regularly and on an ad hoc basis as part of our risk management approach.

### **Auditing and regular reporting**

Detailed information on our supply chain due diligence activities can be found in the [Universal Registration Document and Annual Financial Report](#), which are made publicly available on an annual basis. These reports disclose violations and risk assessment results and provide a detailed description of our actions to mitigate identified risks along with an assessment of their effectiveness. An external auditor audits and validates the reported data.

### **Contact**

Questions and comments about this policy statement or other human rights-related issues can be sent by email to: [CSR@wmf.de](mailto:CSR@wmf.de).