

## Declaration of Principles

### on Respect for Human Rights and Environmental Protection

This policy statement supplements the Glen Dimplex Code of Business Ethics and Conduct for Suppliers and the Code of Conduct for Employees.

Glen Dimplex Deutschland GmbH, with its brands Dimplex and Riedel Kooling, is an internationally operating company. We are aware of our impact and influence in our own business activities as well as along our supply and value chain and recognize our responsibility to respect human rights and protect the environment.

Aligning our business activities with internationally recognized principles and conventions is a high priority for us. First and foremost, these are the Guiding Principles on Business and Human Rights and the United Nations Universal Declaration of Human Rights, supplemented by the Civil and Social Covenants, which define the civil, political, economic and social rights of all people. We are committed to exercising our legal duty of care in complying with the core labor standards of the International Labor Organization (ILO). Specifically, these are the prohibition of child and forced labor, the right to freedom of association and collective bargaining and the freedom from discrimination or the right to equal treatment.

We respect all legal positions on human rights and environmental protection referred to and protected by the German Supply Chain Due Diligence Act (LkSG) and expect all our business partners, in particular our service providers and suppliers, to also commit to these, to comply with appropriate due diligence obligations in their own business unit and to demand the same from their suppliers. We reserve the right to take appropriate measures in response to our business partners, in the event that a specific violation or risk in connection with a protected legal position is identified.

Our position on human rights and environmental protection is anchored in our corporate values and the Glen Dimplex Group's sustainability strategy. As a member of the UN Global Compact Network Germany, Glen Dimplex Deutschland GmbH submits an annual progress report on its Ten Principles.

The managing board of Glen Dimplex Deutschland GmbH is responsible for compliance with legal obligations in all relevant business processes. A Human Rights Officer has been appointed to monitor and support the implementation of due diligence obligations under the German Supply Chain Act. A cross-departmental core competence team consisting of Compliance, Purchasing, Quality Management, Sustainability Management, Human Resources and Finance has been set up. This team is supplemented as required in order to define and implement measures for identified risks.

We have established a complaints system that provides internal and external stakeholders and potentially affected persons worldwide with confidential channels for reporting possible human rights violations and breaches of international conventions. The rules of procedure for our [complaints channels](#) as well as links and contact details can be found on our websites [www.glendimplex.de](http://www.glendimplex.de), <http://www.dimplex.de> and [www.riedel-kooling.com](http://www.riedel-kooling.com). Employees of Glen Dimplex Deutschland GmbH have further access to the complaints system via our intranet and the availability of confidential contact persons is communicated within the company. Confidentiality and protection of whistleblowers against reprisals is maintained at all times. By using the complaints channels via our external service provider SAFECALL, absolute anonymity can be guaranteed.

We see our approach to implementing our due diligence obligations as an evolving process. The foundation is the establishment of effective risk management. A key component of the implementation and monitoring of risk management is a software solution that has been specifically designed in accordance with the requirements of the German Supply Chain Management Act (LkSG). The tool offers an automated risk analysis and comprehensively records all relevant key figures, data and facts on individual suppliers, articles, product groups, requirements and other relevant processes, both within our own business division and along our supply chains. In the risk analysis of our direct suppliers, the first step is to prioritize by looking at the location, industry sector and purchasing volume (abstract risk analysis). Human and environmental rights indices are used for this. A detailed analysis of the suppliers identified in the first step is followed by an individual assessment and prioritization (concrete risk analysis). Risks are weighted in order to arrive at a final supplier score (LkSG score). Mitigation factors, such as a Code of Conduct, are actively integrated into the risk analysis and reduce the assessed risk. Individual risks based on metrics such as extent, probability and irreversibility are assessed for each prioritized supplier. Appropriate measures to minimize or eliminate identified risks or violations are defined and implemented within the scope of our influence.

We are aware that in the conduct of our business activities there are potentials for risks and violations of human rights and environmental protection, as well as in the supply chains for the raw materials and components we use.

As part of the analysis of our own business division, we were able to rule out acute risks to the protected legal positions arising from the Supply Chain Due Diligence Act. Compliance with the above-mentioned human rights and environmental standards in our own business unit is regularly monitored. Information events and training measures are held for our employees as required.

By analyzing our direct suppliers in accordance with the procedure described above, we were able to rule out specific risks in connection with human and environmental rights. Suppliers that were prioritized as potentially risky due to their industry or location were adjusted in the LkSG score through specific questioning or a well-founded assessment based on our supplier evaluation and the risks were excluded.

As part of our collaboration with our direct suppliers, we ensure compliance with the requirements of our Supplier Code of Conduct by conducting targeted surveys (self-assessments) and evaluations. The Supplier Code of Conduct is an integral part of all supplier contracts.

Our procedures for fulfilling our due diligence obligations and their effectiveness are reviewed regularly, at least once a year, and adjusted if necessary. In the event of significant changes in the risk situation or should we become aware of specific indications, we intervene directly and immediately. We report on our activities as part of our reporting obligations under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz).

September 2024

Kerstin Wolff  
Managing Director

David Riemenschneider  
Managing Director

Note: The term "employees" includes managers at all levels and members of executive bodies.