

A modern, multi-story building with large glass windows and a grey facade. The building is reflected in a pool of water in the foreground. In the foreground, there are tall, thin grasses and some purple flowers. The sky is clear and blue. The text 'NOLTE GROUP' is overlaid in the center of the image in a large, white, sans-serif font.

# NOLTE GROUP

The Act on Corporate Due Diligence  
Obligations in Supply Chains





MANFRED WIPPERMANN  
*Managing Director*

## Preamble

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Aware of our role and responsibility in a globally networked economic world, the Nolte Group, as a company with international interdependencies, to actively contribute to improving the human legal situation worldwide. We recognize that our actions along the entire supply chain have a significant impact on the social and ecological conditions in the regions in which we operate. With this in mind, we are committed to conducting our business relationships in a responsible manner and with the highest social and environmental standards.

The increasing integration of our group of companies in global procurement and sales markets brings not only economic opportunities, but also significant challenges. The development of new markets and production sites contributes to the creation of jobs and promote prosperity. However, we are aware of the risks associated with the lack of transparency in parts of our supply chain and the possible lack of enforcement of internationally recognized human rights and environmental standards.

In recognition of these responsibilities and challenges, the Nolte Group is committed to continuously monitoring and improving our business practices. We are committed to creating transparency in our supply chain, ensuring compliance with human rights and to take our environmental responsibility. Through this commitment we want to make a positive contribution to a fairer and more sustainable global economy.

This preamble forms the basis of the Act on Corporate Due Diligence Obligations in Supply Chains and reflects our ambition to be at the forefront of promoting sustainability and ethical business practices. We are aware that this is an ongoing process and are committed to continually evaluating and improve our efforts to fulfill our responsibility as a globally active company.

## Procedures / Risk Management

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In order to fulfill its responsibility and the duty of care in accordance with the Act on Corporate Due Diligence Obligations in Supply Chains, the Nolte Group has introduced risk management in accordance with the concept of the Association of the German Furniture Industry and the German Furniture Quality Association to identify and assess risks relating to applicable human rights and environmental standards in its own business area and in the area of its suppliers.

On the basis of the risk assessment, the Nolte Group takes appropriate measures to prevent and minimize human rights or environmental risks in its own business area, at its direct suppliers and, if it has substantiated knowledge, also at its indirect suppliers.

Among other things, the Nolte Group implements the following measures:

- Appointment of a human rights officer, who can be contacted at:  
**menschenrechtsbeauftragte@nolte.de**
- Regular training of the managers of the Nolte Group companies and sensitization of employees and direct suppliers with regard to the implementation of the above-mentioned basic values in everyday business and the conscious perception of violations of the values.
- Annual and ad hoc risk analysis of the company's own business areas and direct suppliers with regard to the aforementioned legal interests

- Implementation of suitable procurement strategies and purchasing practices to take appropriate account of the results of the risk analysis by documenting the purchasing strategies for all relevant product groups and integrating them into the risk management of these product groups. In addition, compliance with the above principles is agreed in writing by the Nolte Group when concluding contracts with new suppliers. Where possible, the previously agreed standards are raised to a stricter minimum level with existing suppliers if there is an increased risk profile. The direct suppliers are also obliged to pass on these minimum standards to their suppliers. The Nolte Group explicitly points out that compliance is checked at random on an ad hoc basis. Additional preventive measures are also set up and implemented for these suppliers with a higher risk profile in order to reduce the risk profile in the long term.







## Procedures / Risk Management

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- Definition of processes and structures in your own business area in order to implement the human rights strategy. For example, the strategy papers mentioned above stipulate that suppliers with a lower risk profile are to be given preference or promoted. This is particularly important in the case of new acquisitions and quota reallocations.
- The existence of a complaints procedure with a defined process upon receipt of a report; the Nolte Group website provides an easily accessible and anonymous way of submitting complaints.
- Annual and ad hoc checks on the effectiveness of the risk management measures, including through targeted monitoring of measures by the human rights officer and regular and ad hoc reporting in the internal Compliance Committee.
- Participation in workshops of the VDM/DGM industry committee or LKSG working group.
- Review of the effectiveness of the measures and processes per e.g. DGM certificate.
- Regular participation in further training courses offered by the responsible bodies.

*If violations of basic human rights or environmental values are identified as part of risk management, the Nolte Group undertakes to immediately define and implement individual measures that lead to an end or minimization of the violations – if necessary also together with the direct or, if necessary, also with the indirect supplier.*

## Priority Human Rights and Environmental Risks

The Nolte Group upholds a wide range of human rights and environmental values, which are to be fulfilled both by itself and by its direct suppliers.

This includes in particular:

- the payment of wages appropriate to the activity and in accordance with local legal provisions
- the existence of working conditions that comply with local legal provisions on occupational health and safety and working hours
- the avoidance of any form of exploitation, forced labor, slave labor, child labor, human trafficking, torture, unlawful deprivation of land
- acting in accordance with the principles of equality, regardless of gender, national and ethnic origin, language, homeland and origin, religion, political views or disability



- respect for the freedom of association
- the prevention of unlawful forced evictions or other unlawful deprivation of land, forest or water
- preventing the use of security forces if they are not controlled or instructed in such a way that human rights are respected
- protecting the environment from harmful soil, water and air pollution, harmful noise emissions and excessive water consumption, e.g. through waste disposal in accordance with local regulations and efficient use of energy and other resources
- compliance with the ban on the manufacture of products containing mercury, the ban on the use of mercury in manufacturing and the ban on the treatment of mercury waste
- compliance with the ban on the production and use of chemicals in accordance with Article 3(1)(a) and Annex A of the Stockholm Convention of May 23, 2001 on Persistent Organic Pollutants (POPs) and the non-environmentally sound disposal of corresponding waste
- compliance with the ban on the export and import of hazardous waste
- and all other aspects that promote the sustainable, social and environmentally conscious development of society.



## Definition of Human Rights and Environmental Expectations

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### To employees:

*All employees are required to comply with and implement the duties of care to which the companies of the Nolte Group are committed.*

### To suppliers:

*We expect our business partners to also commit to respecting human rights, to establishing appropriate due diligence processes that minimize human rights and environmental risks, and to preventing, stopping or minimizing the extent of violations of human rights or environmental obligations, and to passing this expectation on to their own suppliers.*

## Declaration by the Management

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This declaration of principles will be adapted to the necessary and appropriate requirements on a regular basis and as required.

Löhne, February 1, 2024



MANFRED WIPPERMANN  
*Managing Director*

# Questions and Contact

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If you have any questions about this policy statement or other human rights or environmental issues, please contact:

**Human Rights and Compliance Office**  
**[menschenrechtsbeauftragte@nolte.de](mailto:menschenrechtsbeauftragte@nolte.de)**