

POLICY STATEMENT ON HUMAN RIGHTS AND ENVIRONMENTAL RESPONSIBILITY

Version: December 2025

1. HUMAN RIGHTS STRATEGY

As an international company, we have a responsibility to respect human rights in our business and supply chains, to prevent human rights violations and to contribute to the protection of the environment.

We support the United Nations' 2030 Agenda for Sustainable Development and are guided by the Sustainable Development Goals (SDGs) as a global policy framework. In awareness of our corporate responsibility, we have enshrined human rights and environmental due diligence processes in our organisation and in our relationships with our business partners. They form fundamental components of our company and are subject to ongoing review and further development. This Policy Statement was prepared in consultation with the maxingvest ag, our controlling parent company as defined in Section 17 German Stock Corporation Act (AktG) and entity responsible for our compliance with the Supply Chain Due Diligence Act (LkSG). The Policy Statement is based on the following internationally recognised declarations, conventions and principles

- The United Nations (UN) Universal Declaration of Human Rights
- The United Nations Guiding Principles (UNGP) on Business and Human Rights
- The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) of the International Labour Organization (ILO)
- The ILO's conventions and recommendations on labour and social standards
- The United Nations Convention on the Rights of the Child (UNCRC)
- The United Nations Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- The principles of the United Nations Global Compact (UNGC), of which we are signatory
- The Rio Declaration on Sustainable Development of 1992
- The Paris Climate Agreement of 2015
- The European Union's European Green Deal of 2019

This Policy Statement is reviewed at least once a year, as well as on an ad hoc basis, by Tchibo GmbH's Human Rights Officers to ensure that it is up to date and adapted as necessary.

2. OUR DUE DILIGENCE PROCESSES FOR HUMAN RIGHTS AND ENVIRONMENTAL PROTECTION

As part of our due diligence processes, which have been in place for years in the coffee and non food sectors, we identify and analyse the risks that our business activities may pose to people and the environment. Based on this risk analysis, we develop targeted measures to prevent, resolve or minimise risks to human rights and the environment. We review the effectiveness of our measures regularly in order to continuously improve our processes.

In our due diligence processes, we prioritise the areas that represent the greatest risks to human rights and the environment and where we see our biggest impact. In addition to our direct contractual partner, our processes in the coffee and non food sectors also focus on the deeper supply chain, as this is where the greatest risks to human rights and the environment arise. We have also implemented procedures addressing our indirect sourcing in order to minimise the possibility of human rights violations and environmental risks.

2.1 OUR RISK ANALYSIS

In our risk assessments, we identify human rights or environmental risks that are linked to our business activities - nationally or in our global supply chains. In our assessments, we consider the industry sectors relevant to Tchibo and all stages of the supply chain depending on their impact, as well as the national context and local conditions. As vulnerable and disadvantaged groups such as women, indigenous communities, migrant and seasonal workers, children and people with disabilities are often particularly affected by human rights violations, special attention is paid to them when identifying and analysing risks. In this overall view, we determine the abstract risks. Where risks are identified, we carry out a specific risk assessment to determine the likelihood of a human rights violation and the potential severity of the impact on those involved.

We also carry out ongoing assessments of the human rights situation in manufacturing countries, basing our approach on publications from human rights organisations and research institutes. We incorporate the results into our purchasing strategy, using them to form the basis for any measures we implement.

We have identified and prioritised the following risks to human rights and the environment and consequent fields of action in our supply chains and our own business division:

- Child labour
- Forced labour and modern slavery
- Health and safety at work
- Working hours

- Freedom of association and collective bargaining
- Discrimination, harassment and violence at work
- Living wages
- Climate action
- Sustainable land use
- Water conservation

The results of our risk analysis in the fields of human rights and the environment have a direct impact on our processes when it comes to supplier selection, business partner management and product development in all our sectors. Our risk assessment processes thus form the basis for identifying appropriate measures.

2.2 PREVENTIVE AND REMEDIAL MEASURES IN OUR SUPPLY CHAINS

Based on the risks identified and the impact we can have on mitigating them, we respond with appropriate measures to protect human rights and environmental standards in our supply chains. It is not uncommon for our measures to be both preventative and remedial:

- Establishment of long-term partnerships with suppliers, producers and civil society, such as in our selected country programmes in the coffee sector
- Ongoing development of our sustainable procurement and purchasing practices, e.g. through a concentrated portfolio of producers or through direct business relationships
- Programmes to improve working and environmental conditions throughout the supply chain
- Strengthen social dialogue through our Global Framework Agreement with IndustriAll and the WE program
- Development of innovative approaches and industry-wide alliances to address systemic challenges together, such as ACT with the aim of implementing a living wage in the textile industry, or our Tchibo Sustainable Coffee Programme ("Coffee to stay")
- Provision of training in relevant business areas and with high-risk suppliers e.g. on human right risks such as child labour
- Implementation of Tchibo Supplier Code of Conduct (SCoC) for suppliers and service providers
- Social and environmental audits to ensure compliance with the Tchibo SCoC (risk-based approach)
- Implementation of the majority of our textiles with recognized sustainability standards (e.g., GOTS, RCS, CmiA) and long-term increase in the proportion

2.3 GRIEVANCE PROCEDURE

Our grievance procedure enables individuals and organisations to point out human rights and environmental risks, as well as violations of human rights or environmental obligations that have arisen as a result of actions by Tchibo or those of a direct or indirect supplier. Our aim is to become aware of grievances at an early stage, both in our own business units and in the supply chain, to find remedies – where possible in dialogue with the parties involved – and to develop and implement effective preventative measures.

Depending on the business segment, various grievance channels are available to internal and external individuals for pointing out risks to human rights and the environment or violations in their own business segment or the supply chain:

- Via email to socialcompliance@tchibo.de for anyone affected in our supply chains
- Via the WE program, where factory workers can get in touch with the WE program facilitators and local Tchibo employees
- Via the grievance channel for our industry initiatives (ACT or the International Accord)
- Via Ear4U, a joint grievance channel and procedure for the coffee sector, for participating member companies of the German Coffee Association
- Via the Tchibo whistleblowing system for our own employees, among others

When we receive a grievance, it is recorded, investigated and processed by Tchibo employees who are not bound by instructions in the performance of their duties. If necessary, independent experts are consulted during the investigation. On the basis of the investigation, we draw up an action plan together with the relevant Tchibo departments, for example Purchasing, with the aim of clarifying the grievance and putting an immediate end to any human rights violations. We do everything in our power to resolve every grievance in collaboration with those affected and those responsible. The results are then incorporated into our risk assessments, human rights and environmental policies, and training and business processes to prevent further violations.

3. EXPECTATIONS AND OBLIGATIONS

The values and norms enshrined in the conventions underlying this Policy Statement are reflected in our own standards and regulations. The Tchibo Code of Conduct is a binding guideline for all Tchibo employees worldwide. It obliges them to implement our values for ethical business practices and good corporate conduct in their daily actions and in their dealings with business partners. Our requirements for our business partners are contained in our Supplier Code of Conduct (SCoC). This provides our business partners with binding criteria for responsible conduct in accordance with ethical and legal standards. Our social and environmental standards serve to protect all our employees, regardless of whether they work for us directly or indirectly for our business partners. They focus on preventing serious human rights violations (such as forced labour or child labour) as well as ensuring protection of occupational health and safety and environmental

protection. In addition, we consistently align our actions in our agricultural supply chains with our Human Rights and Environmental Policy in Agricultural Supply Chains (Agricultural Policy). We expect our business partners to do their best to implement these requirements in their own organisations through a due diligence approach. In 2016, we signed a Global Framework Agreement with IndustriALL Global Union. By doing so, we committed to specifically protecting the right to freedom of association and the right to collective bargaining throughout the Tchibo non food supply chain. In our Greenpeace Detox Commitment, we have made a public commitment to eliminating hazardous chemicals from our textile supply chains and are addressing this at four levels: product development, monitoring, training and cross-sector engagement.

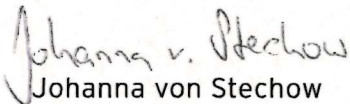
3.1 WE REPORT ON OUR PROGRESS

We provide information on our progress in the fields of human rights and environmental due diligence on our website. Our Human Rights Officers provide risk management updates to the Tchibo GmbH management team on a regular and ad-hoc basis. The Tchibo GmbH management team is responsible for the implementation of and compliance with this Policy Statement.

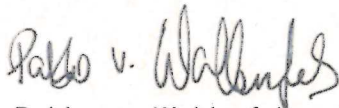
Hamburg, December 2025



Erik Hofstädter, CEO
Chair of the Management Board



Johanna von Stechow
Human Rights Officer



Pablo von Waldenfels
Human Rights Officer