

KLETTGRUPPE

The Klett Group
Human Rights Policy

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The Management Board of the Klett Group and the management teams of all Klett Group companies understand that our business will only be able to achieve long-term success if the impact of our activities is in harmony with people and the environment.

We are therefore committed to respecting human rights within our companies and throughout our value chain. We base our actions on the following guidelines and standards:

- United Nations Universal Declaration of Human Rights (UDHR)
- United Nations International Covenant on Civil and Political Rights (ICCPR)
- United Nations International Covenant on Economic, Social and Cultural Rights (ICESCR)
- United Nations Convention on the Rights of the Child (UNCRC)
- United Nations Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW)

- ILO (International Labour Organisation) international labour standard Conventions and Recommendations
- Charter of Fundamental Rights of the European Union

We know that the implementation of human rights due diligence in our own business operations as well as in supply and value chains is an ongoing process. For this reason, we continuously examine where particular risks concerning human rights violations exist in our supply chains and our own company.

We assess these risks annually at individual company level as part of our decentralised compliance organisation and on the basis of our company-wide Compliance Policy and include them in the Klett Group risk report. The Management Board bears responsibility for this. In the event of grievances, remedial action is taken immediately.

With regard to this risk analysis, we, the companies of the Klett Group, strive to ensure in particular that:

- We, as an educational company, provide children with a high level of protection and ensure that all our products and services are free from content that may harm the wellbeing, development or health of children
- All our companies comply with occupational health and safety regulations
- The right to freedom of assembly and association of all employees is protected at all times
- No workers are subjected to unequal treatment and nobody is deprived of a reasonable/minimum wage.

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With regard to our supply chains and related risk analysis, all of our companies pay particular attention to:

- The prohibition of child labour and protection of minors
- The prohibition of forced labour and slavery
- The right to safe working conditions and fair pay
- The prohibition of discrimination and the right to equal opportunities
- The right to freedom of assembly and association and
- The prevention of fundamental damage to the environment as a result of the purchasing and production process, especially in connection with the production of paper and the materials used in day-care centres and schools. This also applies to indirect suppliers.

We expect everyone at the companies of the Klett Group and our suppliers to comply with human rights and, in particular, to take due account of the above risk analysis-related considerations.

For their part, the companies of the Klett Group ensure, in particular, that:

- They implement these principles within their companies and across their supply chains
- All parties here respect human rights and observe all applicable policies and standards
- They implement procurement practices that minimise or even exclude the risks identified
- They take preventive measures to avoid human rights violations and minimise environmental risks. These include, for example, internal training or measures that contractually commit their suppliers to respecting human rights and the fundamental protection of the environment.

The companies continuously review the effectiveness of the prevention measures. This is monitored by the Management Board within the framework of the Group-wide compliance organisation.

In the event of a human rights violation or breach of environmental duty, the Klett Group companies or the Management Board itself will take appropriate remedial action to redress the breach or violation. If the breach or violation is caused by a supplier, we will work with the supplier to determine appropriate remedial action. If there is no prospect of a swift resolution, we reserve the right to terminate the supplier relationship. Remedial measures are also continuously reviewed to ensure their sustained effectiveness.

The Klett Group appoints a human rights representative to monitor risk management within the Group.

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We have set up a whistleblowing mechanism on the Klett Group homepage www.klett-gruppe.de/en/supplychain. Any violations of human rights or environmental standards can and should be reported there. A transparent procedure for handling reports is intended to ensure that any violations are brought to our attention as swiftly and in as much detail as possible to allow us to take remedial action:

We continuously document the fulfilment of our obligations, the measures required, all reports and the remedial action taken. All whistleblowers are protected. Our compliance with due diligence obligations during the previous financial year is reported on the Klett Group website, www.klett-gruppe.de/en/supplychain, within four months of the end of the financial year. This document remains publicly accessible for 7 years from its creation.

This policy document is subject to changes at any time. It is regularly updated, for example, following the evaluation of the results of risk analyses performed under the Supply Chain Due Diligence Act.

February 2023 – The Management Board