



Declaration of Principles

About the company

The GLOBUS Group St. Wendel operates large-scale hypermarkets (hereinafter referred to as GLOBUS Markthallen) and specialist stores (hereinafter referred to as GLOBUS Baumarkt).¹

For GLOBUS, taking responsibility and contributing to environmental and social compatibility within the scope of our activities is always a top priority. We are therefore committed to complying with and monitoring human rights and environmental due diligence obligations throughout the company.

This declaration of principles concretizes our mission statement and our values (human rights strategy). It therefore forms the basis for cooperation with our employees and business partners.

Based on this, this declaration lays down the foundations for all guidelines and regulations that ensure GLOBUS acts responsibly.

Basic principles of our actions

In line with our central mission statement „Living responsibility for people, nature and business“, we take responsibility throughout our entire supply and value chain. This includes our own business area as well as the area of our business partners, not just limited to suppliers of goods.

In terms of content, we base this declaration of principles on our mission statement and values, our commitment and our actions to implement the applicable laws and guidelines as well as international standards and frameworks.

In addition, we are guided in particular by the following international regulations:

- United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles)
- Recommendations of the International Labor Organization (International Labor Organization - ILO)
- United Nations Universal Declaration of Human Rights



¹) GLOBUS Markthallen and GLOBUS Baumarkt hereinafter also referred to jointly as GLOBUS.

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Challenges of the GLOBUS Group

As a trading company with a large number of contractual partners, we are faced with a variety of different challenges and potential risks. In the food and DIY sectors, companies work with sensitive goods or raw materials and articles on a daily basis, which can be exposed to potential risks during procurement, especially if they come from third countries, such as

- Deforestation
- child labor
- Forced labor
- Compliance with occupational health and safety
- Compliance with working hours
- Compliance with freedom of association
- Minimum wage
- Discrimination
- Failure to comply with the relevant environmental and waste legislation

We identified and prioritized these challenges by means of a risk analysis.

Dealing with the challenges

GLOBUS was aware of these challenges even before the Supply Chain Due Diligence Act came into force and has always complied with the relevant legal regulations and ensured their implementation. Nevertheless, GLOBUS has taken the introduction of the Supply Chain Due Diligence Act as an opportunity to reassess and prioritize these risks.

As a first step, GLOBUS defined responsibilities for all sub-areas of the Supply Chain Due Diligence Act. These ranged from project planning and implementation to ongoing implementation, monitoring and follow-up.

A risk analysis of our business partners was then carried out. In the course of this, the business partners were clustered into different risk categories, in particular on the basis of their goods/services, the raw materials used and the country of origin or registered office of the company.

The risk analysis is carried out annually on a rolling basis and on an ad hoc basis.

In the context of this analysis, GLOBUS has developed a series of preventive measures.

One of these preventive measures is the fact that the obligations arising from the Supply Chain Act become the subject of relationships with our business partners. Among other things, this is based on a code of conduct that applies to business partners by mutual agreement as part of the contractual relationship.

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This Code of Conduct also obliges our business partners to pass on the obligations imposed on them under the LkSG to their own business partners. This Code of Conduct was negotiated with existing partners and incorporated into our contracts as a contractual component for future partners. This Code of Conduct was approved by the Management Board and subsequently published on our website for public viewing.

GLOBUS works with specialized service providers to monitor the risk situation effectively and sustainably. As a building block for fulfilling its obligations, our company uses, among other things, a software solution that enables us to monitor business partners and thus ensure that the potentially identified risks do not actually exist and do not materialize in the future.

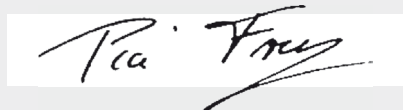
In addition, training measures for employees and business partners ensure that a high level of awareness of the requirements of the Supply Chain Act is achieved at GLOBUS.

Most recently, a comprehensive complaints procedure was introduced, which business partners, their employees, our employees and all other third parties can use to report complaints or actual violations of environmental and human rights requirements. This complaints procedure has been published on our website and is freely accessible to everyone. Reports recorded there are then reviewed by our complaints team and appropriate preventive and remedial measures are initiated where necessary.

All of these mechanisms are monitored by the relevant staff unit, for example by a human rights officer, transparently documented and checked for effectiveness.



Timo Huwer
Spokesman of the
Management Board



Pia Frey
Managing Director



Gerald Neumayr
Managing Director



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GLOBUS Baumarkt Ost GmbH & Co. KG
GLOBUS Baumarkt Wetzlar GmbH & Co. KG
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