

# Human Rights Policy Statement

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We, Eurasia Statinvest Holding as an owner-operated company, are convinced that lasting (economic) success can only be achieved when business operations are conducted in a socially just and environmentally friendly manner. As a trading company that sources internationally, this also applies to our global supply and value creation chains.

We are aware of the responsibility this entails for us as a business operation, and consequently observe the following international standards and guidelines:

- The Organisation for Economic Cooperation and Development Guidelines for Multinational Enterprises (OECD)
- The United Nations Convention on the Rights of Children (UN-CNC)
- The United Nations Convention on the Rights of Women (UN-CEDAW)
- The International Labour Organisation Conventions and Recommendations on Labour and Social Standards (ILO)
- The United Nations Guiding Principles on Business and Human Rights (UN)
- Zero Discharge of Hazardous Chemicals (ZDHC)

In addition, we support the use of sustainable materials such as recycled raw materials and natural fibres, wood, as well as wood-based components from proven and responsible manufacturing and production.

Our goal is to encourage more sustainability for products and packaging as well as in relation to humans and nature.

As early as the supplier qualification stage (onboarding due diligence), we attach importance not only to quality but also to compliance with fundamental social and environmental standards.

The basis is our Code of Conduct, which all suppliers and service providers must agree to before working with us and implement continuously.

The request for subcontracting of our orders involves the same qualification procedure as for our direct suppliers and is only accepted after an evaluation and compliance with our specifications.

We conduct a corresponding ongoing due diligence with preventive and corrective measures on a regular basis, at least once a year.

This Code of Conduct commits to compliance with the following standards, among others:

- Prohibition of child labour, minimum age of 15 years (or legal age in the respective country, if higher).
- Prohibition of any form of forced labour
- Right to freedom of association and collective negotiation
- Respectful treatment and non-discrimination
- Payment of a fair wage, at least the national legal minimum wage
- Compliance with legally established working hours
- Responsible practices in recruitment and termination
- Compliance with occupational health and safety
- Establishment of an environmental management system and minimization of the impact of chemicals, wastewater, waste, air and noise emissions
- Prohibition of corruption and bribery
- Increasing use of sustainable materials
- Unauthorized subcontracting
- Ensuring transparency and access to production sites
- Valid certificates, licenses, and audit reports

To achieve this goal together with responsible partners, we are members of various social and environmental initiatives:

- amfori BSCI (Business Social Compliance Initiative)
- BEPI (Business Environmental Performance)
- SEDEX (Supplier Ethical Data Exchange)
- ICTI Ethical Toy Program

We also carry out our own additional and regular inspections at our production sites.

We are aware of the positive and negative impacts we cause in our sourcing countries. As a company, we have a responsibility to minimize negative impacts on people and the environment due to our global supply chain and take this into consideration in our sourcing and procurement process and identify any risks on an ongoing basis.

One part of this is to set our purchase and sales prices and delivery dates in such a way that dignified working conditions are possible and that price and deadline pressures do not necessitate exploitation of workers in the form of wage dumping or unpaid overtime, reduction of safety measures or similar.

With the help of our risk analysis, we have analyzed our sourcing countries. In addition, we have taken into consideration the potential and actual risks that have occurred in our supply chain to identify and assess the main environmental and social risks so that we can derive suitable preventive and corrective measures.

The result of the amfori Country Risk Classification applies to the risk assessment: <https://www.amfori.org/resource/country-risk-classification-2022>

Manufacturing countries with a risk potential require a current and valid audit of a social initiative (e.g. amfori BSCI).

Analyzing the probability of occurrence and severity of risks per country, our focus in the environmental area is on avoiding hazardous chemicals, reducing water consumption and its pollution, and reducing greenhouse gas emissions.

In the social area, we prioritize the prevention of discrimination, reduction of overtime as well as fair and appropriate remuneration and the special protection of vulnerable groups.

In the context of our business activities, the following vulnerable stakeholders and groups are affected: female employees, members of ethnic minorities (e.g. Uyghurs and other Muslim minorities in Asia), and employees under the age of 18.

These groups are at increased risk of negative working conditions. In addition, they face an increased risk of discrimination and exploitation.

We are committed to giving all vulnerable groups equal opportunities and protecting their rights. This includes access and the right to education, healthcare, protection from violence, protection from human rights violations, protection from persecution and discrimination based on their ethnic or religious affiliation and employment without discrimination. In order to record and investigate possible incidents or violations, we have set up a reporting system in which affected employees (both internally and externally from suppliers and service providers) can contact us on a personalized or anonymous basis:

<https://www.eurasia-statinvest.com/soziale-verantwortung/>

Furthermore, we provide our employees in the respective sourcing markets with business cards and posters with appropriate contact information and clarification on how to report a complaint to us.

These are distributed during our on-site visits and displayed in the factory for all employees to see.

Eurasia Statinvest Holding with its subsidiaries: Carstensen Import-Export Handelsgesellschaft mbH, STYLEX Schreibwaren GmbH and Felidae (Europe) GmbH expects all business partners and employees to adhere to these principles.

Eurasia Statinvest Holding with its subsidiaries: Carstensen Import-Export Handelsgesellschaft mbH, STYLEX Schreibwaren GmbH and Felidae (Europe) GmbH and or its associated companies identify the risks and potential impacts of its business activities on human rights and prioritise areas harbouring a greater risk of human rights violations.

The primary basis for said prioritisation of risks is the OECD's assessment of sector-specific risks in the different industries.

Ensuring due diligence is an ongoing process, in which we continuously review and improve our business and CSR strategies.

Ellerau, December 2023

A blue ink signature of Sönke Carstensen, consisting of a large, stylized 'S' followed by a horizontal line and a small flourish.

Sönke Carstensen  
Director

A blue ink signature of Martin Pancke, written in a cursive style with a long, sweeping underline.

Martin Pancke  
Director