

TWH

the
wallfashion
house

Supplier Code of Conduct

*This document sets the minimum standards
we expect from our suppliers and their subcontractors.*

1. Introduction

The Wallfashion House and its subsidiaries ("TWH") are committed to conducting business with integrity, respect for people, and care for the environment. We recognize that our products rely on raw materials, chemicals, packaging materials, logistics and manufacturing processes that can create environmental and social impacts. We therefore seek long-term, collaborative partnerships with suppliers who share our commitment to responsible business conduct.

This Supplier Code of Conduct ("Code") sets out the standards and expectations that apply to all suppliers providing goods or services to TWH. It forms an integral part of our business relationship. Compliance with this Code is a condition of doing business with TWH.

2. Applicability, Scope and Definitions

This Code applies to all suppliers, contractors, consultants, agents, intermediaries, distributors and other business partners (collectively, "Suppliers") that provide goods or services to TWH.

Suppliers are expected to communicate these standards to their own suppliers, subcontractors and other relevant business partners and to take reasonable steps to promote alignment with this Code throughout their supply chains.

This Supplier Code of Conduct is publicly available on the official websites of The Wallfashion House and/or its affiliated entities. Suppliers are expected to familiarise themselves with the most recent version of this Code and ensure ongoing compliance.

3. Compliance with Laws, Rules and Regulations

Suppliers must comply with all applicable laws, rules and regulations in the countries in which they operate and do business. Where local law and this Code differ, suppliers must apply the higher standard to the extent permitted by law.

Suppliers should maintain adequate governance, policies, training and internal control systems to prevent, detect and address violations of law and of this Code.

4. Human Rights and Fair Working Conditions

4.1 Respecting and Protecting Human Rights

Suppliers must respect internationally recognized human rights and treat all employees and stakeholders fairly, with dignity and respect. This includes, as a minimum, the principles set out in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights (UNGPs)

4.2 Freedom of Association and Collective Bargaining

Suppliers must respect the freedom of association, the right to collective bargaining and the principles of equal opportunity in accordance with applicable laws and regulations.

4.3 Non-Discrimination, Harassment and Abuse

Suppliers must not discriminate against employees or subject them to reprisals based on gender, age, ethnic origin or descent, nationality, race, disability, sexual orientation, religion, political views or any other protected characteristic. Physical or psychological violence, coercion and sexual harassment must not be tolerated.

4.4 Forced Labour, Child Labour and Human Trafficking

Suppliers must ensure that they do not engage in or benefit from any form of child labour, forced labour, modern slavery or human trafficking. Suppliers must comply with all applicable national laws and, at a minimum, the International Labour Organization (ILO) core conventions, including those related to forced labour (Conventions No. 29 and 105) and child labour (Conventions No. 138 and 182).

4.5 Fair Wages and Working Hours

Suppliers must pay fair wages, provide legally required benefits, and comply with maximum working hours and rest periods in line with local law.

4.6 Land Rights and Security Practices

Suppliers shall refrain from unlawful evictions and theft of land, forest and water. Where suppliers employ security guards, they must ensure that such personnel act in accordance with applicable law and respect human rights.

5. Health and Safety

Suppliers must ensure the health and safety of employees in the workplace and maintain a working environment that contributes to the prevention of accidents and minimizes health risks. Suppliers must comply with applicable occupational health and safety laws and should provide training and appropriate protective equipment to employees.

Suppliers should implement risk assessments, incident reporting and corrective actions. If applicable, suppliers are encouraged to align with recognized health and safety management practices (e.g., ISO 45001) and continuous improvement.

6. Business Ethics and Integrity

6.1 Fair Competition

Suppliers are expected to observe the principle of fair competition and comply with applicable competition law.

6.2 Anti-Corruption and Bribery

TWH does not tolerate any form of corruption, bribery or other unfair trade practices. Suppliers must prohibit the giving, making or offering of gifts, entertainment, inducements, donations, sponsorships, kickbacks or anything else of value to private individuals or public officials for the purpose of improperly influencing business decisions or inducing them to act in violation of their duties.

6.3 Money Laundering Prevention

Suppliers must comply with applicable legal provisions aimed at preventing money laundering and must not participate in any way in money laundering activities.

6.4 Conflicts of Interest

Suppliers should disclose all actual or potential conflicts of interest that could influence, or appear to influence, the business relationship with TWH. Suppliers must notify TWH promptly and take steps to mitigate such conflicts.

7. Trade Compliance: Export Controls and Sanctions

Suppliers must comply with applicable laws regarding the import and export of goods, services and information, as well as applicable embargoes and sanctions. Suppliers must also maintain appropriate screening and controls to prevent dealings with sanctioned parties where required by law.

8. Environmental Protection, Product Safety and Product Integrity

8.1 Environmental Responsibility

Suppliers must comply with all relevant environmental laws and are expected to apply recognized environmental standards. Suppliers should use natural resources sparingly and responsibly and minimize the negative impact of their activities on the environment, climate, biodiversity and water resources.

Suppliers should implement suitable environmental and safety management systems to identify, prevent and reduce environmental impacts, and to improve performance over time (e.g., energy efficiency, waste reduction and pollution prevention).

8.2 Chemical Safety and Hazardous Substances

Suppliers must comply with applicable chemical and product safety regulations (including, if applicable, EU REACH and CLP) and ensure safe handling, storage, transport, use and disposal of hazardous substances, goods and waste.

8.3 Packaging and Labelling

Suppliers must comply with applicable packaging and labelling requirements. Where suppliers provide packaging or packaged goods for the EU market, they must support TWH with packaging specifications and evidence needed to comply with EU packaging rules (including recyclability, recycled content and labelling requirements where applicable).

8.4 Deforestation-free and Nature-positive Sourcing (if applicable)

Where suppliers provide commodities or materials that may fall under deforestation-related requirements (e.g., wood, paper, rubber or other relevant products), suppliers must be able to provide traceability information and evidence of legal and deforestation-free sourcing in line with applicable EU requirements.

9. Responsible Sourcing and Supply Chain Due Diligence

9.1 Conflict Minerals and High-Risk Raw Materials

Suppliers must take appropriate measures to prevent the use of raw materials in their products that directly or indirectly contribute to human rights violations, corruption, the financing of armed groups or similar harmful effects.

If applicable, suppliers are expected to align with internationally recognized due diligence frameworks for minerals and metals sourced from conflict-affected and high-risk areas (e.g., OECD due diligence guidance) and to provide relevant information upon request.

9.2 Risk-based Due Diligence and Transparency

Suppliers should conduct risk-based due diligence to identify, prevent, mitigate and address adverse impacts connected to their operations and supply chains. This includes maintaining appropriate management systems, mapping key supply chain risks where feasible, and engaging with subcontractors to address identified risks.

Suppliers must notify TWH promptly if they become aware of significant incidents, legal non-compliance, severe human rights issues, or environmental harms connected to products or services supplied to TWH.

10. Data Protection, Confidential Information and Intellectual Property

Suppliers must comply with applicable data protection and privacy laws (including, if applicable, the GDPR) and implement appropriate technical and organizational measures to protect personal data and business information.

Suppliers must respect and ensure the confidentiality of TWH's and other business partners' confidential information and intellectual property. Such information may only be used for approved purposes and must be handled securely.

11. Whistleblowing, Complaints and Non-Retaliation

Suppliers are expected to enable employees and stakeholders to raise concerns or report potentially unlawful practices or violations of this Code without fear of retaliation. Suppliers may set up their own speak-up/whistleblowing system or join an industry-wide system.

Furthermore, suppliers are expected to inform their employees about TWH's whistleblower and complaints system, which can be reached by email at compliance@dsn-group.de or whistleblower@grandecogroup.com.

No form of direct or indirect retaliation will be tolerated against any person who, in good faith, raises concerns or reports misconduct.

12. Monitoring, Audits, Corrective Actions and Consequences

TWH reserves the right to evaluate suppliers or to conduct audits or assessments (directly or through authorized third parties) to verify compliance with this Code. Suppliers must properly record relevant information and provide requested information and documents within a reasonable period of time.

TWH will contact the supplier in advance to agree on the scope, time and location of any audit, unless an immediate response is required due to severe risk or incident.

Violations of this Code, especially violations related to human rights, health and safety, environmental protection, or legal compliance, must be remedied promptly. Suppliers must work with TWH to identify appropriate remedial actions and adopt effective controls to prevent recurrence.

If a supplier fails to adequately address an issue within a reasonable period of time, TWH reserves the right to terminate the business relationship for cause without further notice and without prejudice to any other legal or contractual rights.

13. Supplier Acknowledgement

By continuing to do business with TWH, suppliers acknowledge that they have read and understood this Code and commit to comply with it and to promote these standards throughout their supply chain.