

reflects.

Policy statement and guideline on respect for
human rights and protection of the
environment

Status as of 01.01.2026



Promotional items are our world. Since 1988, we have been buying, developing, customising and distributing a wide range of promotional products that make advertising messages become palpable. We are passionately dedicated to developing, sourcing, designing, producing and marketing high-class promotional products. With our brands RETUMBLER®, REEVES® & RE98, we now concentrate on a few, deliberately selected product groups and are among the recognized specialists in the industry. Starting with our own design, sourcing in Asia where the products are manufactured by our suppliers, trading within Europe and customising promotional items in Cologne, we have the most important value-adding processes in our own hands.

As a dutiful company, REFLECTS® considers itself as responsible when it comes to respecting human rights and sustainability. After all, both are crucial for the company's continued existence and include the care for our approximately 80 employees, customers, ensure participation within the region and cooperation with our suppliers in a spirit of partnership. Our commitment is always entirely voluntary.

Accountability

The management of REFLECTS GmbH is responsible for the implementation of and compliance with the Declaration of Principles on Respect for Human Rights. Operational implementation is carried out by compliance officers appointed by the management, in particular in purchasing and product and sustainability management. The local employees are supported by REFLECTS Ltd. in Hong Kong, which takes care of the monitoring of suppliers in the Far East.

Standards

In order to live up to our commitment to recognize and respect people and the environment, we are also committed to the principles of the following internationally recognized frameworks and standards:

- United Nations Universal Declaration of Human Rights (UN UDHR)
- the related UN Convention on the Rights of Children
- the Conventions on the Elimination of all Forms of Discrimination against Women
- Conventions and Recommendations of the International Labor Organization (ILO) on Labor and Social Standards
- UN Global Compact and Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD)
- Charter of Fundamental Rights of the European Union

We are as committed to the three-pillar principle of sustainability as we are to the 17 Global Sustainable Development Goals of the 2030 Agenda.

Continuous improvement process and risk analysis

Therefore, our top priority is: We constantly seek to work on achieving the optimal symbiosis between economic efficiency, social compliance and environmental compatibility. We regard the implementation of human rights and environmental due diligence as an ongoing process, which is regularly reviewed to verify its effectiveness and continuously improved. In this context, we voluntarily identify the greatest human rights risks in our business activities at annual intervals and identify potential and actual violations insofar as this is within our sphere of influence.

Our own employees and our direct, immediate suppliers constitute the main focus in this respect. Within our analysis, we categorize risks according to high (e.g. child and forced labor, discrimination, lack of occupational safety, lack of freedom of association, country-specific risks, corrective action absolutely necessary), medium (country-specific risks as well as auditable documentation and certification/auditing according to relevant standards, corrective action necessary in the medium term) and low or no need for action (country-specific conditions as well as detailed, auditable documentation and certification/auditing according to relevant standards, corrective action not necessary until the long term) and prioritize our efforts accordingly. For the identified risks, we derive measures to preventively avoid risks in the long term if possible or to measurably reduce the risk.

With a

- Code of Conduct for our business partners,
- a Health and Safety Policy,
- our environmental guidelines,
- our environmental management system and program in accordance with Ökoprofit
- a sustainability reporting system based on the German Sustainability Code
- an anti-corruption policy
- our data privacy policy
- a whistleblower system
- a voluntarily established system to involve our suppliers in the supply chain due diligence (agreement with our partner in the Far East, supplier declarations and questionnaires within the framework of the supply chain due diligence, annual certification/audit/(evaluation queries and control as well as audits based on an evaluation questionnaire by our partner in the Far East, supplier evaluation, use of a monitoring tool to ensure compliance with legal requirements).
- training and information of our employees and other stakeholders
- supplier declaration REFLECTS
- and with this policy statement

we provide guidance, information and rules that sustainably support our system of values.

Furthermore, we have defined core topics and processes for ourselves, which will be gradually adapted to our progress. These include:

- **Monitoring our sustainability efforts:** The development and continuation of an internal environmental management system and environmental management. We are tracking consumption and key performance indicators and identifying development needs in an ongoing process, if necessary by involvement of stakeholders. (environmental programme). (certification according to Ökoprofit)
- **Resource management:** We avoid waste through recovery, recycling, multiple use, substitution at the Cologne site (e.g. other packaging materials, packing on demand, replacement of product packaging, change of materials).
- **Sustainable products and processes:** We use and process non-harmful materials, carefully select products and have processes monitored by our partners in the Far East. We are constantly working in order to improve our products and thus develop sustainable concepts (reusability, durability, packing on demand, configuration concepts, assembling in Germany, Co2e balancing and offsetting "on demand").
- **Legal compliance:** Legal requirements are also creating new premises that we as a company have to adapt to constantly. We comply with laws and regulations and make them an integral part of our company's processes. We are working with Product IP for our products.
- **Stakeholders:** We encourage awareness of environmental and human rights issues among our suppliers, customers and employees through measures, regulations, advertisements and publications in industry-standard magazines and online media. We also train and inform our employees in all relevant matters.

Measures

REFLECTS GmbH expects all employees, business partners and commissioned third parties to comply with applicable laws and human rights conventions.

We create a basis for the evaluation of our supplier structure through tools, agreements, queries, audits by our partner in the Far East and annual risk analysis. As part of this assessment, we keep a catalogue of corrective measures. If we become aware of violations with regard to the Supply Chain Act, we endeavour to take action. In developing our countermeasures, we have taken care to cover as many areas of potential violations as possible, even if they do not actually occur. We have divided the catalogue of measures into the following potential areas:

- Compliance and development of specifications and guidelines with the involvement of employees
- Health and safety
- Fair working conditions and remuneration
- Environmental protection
- Grievance mechanisms
- Ethical behaviour
- Exclusion of precarious working conditions

Whistle-blower System

Despite all due care, we are aware of the fact that violations might happen. Therefore, we have voluntarily established a complaints mechanism:

Information helps us to protect our company, our colleagues and our business partners in the event of legal violations. They give us the opportunity to uncover irregularities at an early stage, to avert damage and to act in case of doubt and within the scope of our influence.

The impartial ombudsman for complaints under the Supply Chain Act is:

SBB-Consulting UG (hb)

Mr Johann Böhmer

Salierring 32

50677 Cologne

The ombudsman is subject to professional secrecy and can be contacted via a dedicated e-mail address. Information on the reporting party is not disclosed and confidentiality is guaranteed. The provisions of the DSGVO are complied with. Reporting parties are protected from reprisals. Mr Böhmer acts as an intermediary between the whistle-blower and REFLECTS GmbH.

Information can be sent to complaint@reflectscompliance.com and will be passed on neutrally to us for processing by the ombudsman while preserving your anonymity. You will be kept informed about the progress of the process via the ombudsman.

Furthermore, there is of course the opportunity to contact the respective superiors or known contact persons at REFLECTS GmbH directly. In cases of doubt, our ombudsman will advise you on how to proceed.

Transparency

In our sustainability report based on the German Sustainability Code, we have provided a comprehensive account of our actions. Further information is available on our website. This policy statement, as well as other documentation and processes, is subject to regular review.

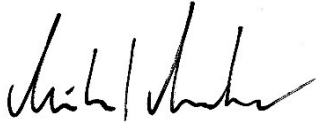
The Supply Chain Sourcing Obligations Act will apply from 1 January 2023 and, with the requirements described therein, will only affect large companies with more than 3,000 employees and, from 1 January 2024, finally companies with more than 1,000 employees. We therefore emphasise that we undertake the measures and efforts described in this policy statement voluntarily.

We do not accept demands for annual audits of our company in any applicable declarations, as the Supply Chain Sourcing Obligations Act does not provide a legal basis for obliging any suppliers in this respect.

Furthermore, disclosure of the names of the companies involved in our supply chain to external companies is not required for the reasons mentioned and is not exercised by us.

REFLECTS GmbH

Meinhard Mombauer

A handwritten signature in black ink, appearing to read 'Meinhard Mombauer', written in a cursive style.

CEO