

Miele Responsible Business Policy

1. Preamble

Miele has been an independent family-owned company since its establishment in 1899. The company's focus is on manufacturing domestic appliances for the kitchen, for laundry and floor care, as well as machines for use in commercial operations and medical facilities („Miele Professional“). The strategic vision is to be the world's most trusted and desirable premium brand.

Miele offers products to its customers aiming for setting standards for durability, performance, ease of use, energy efficiency, design and service. This corresponds to the guiding principle „Immer Besser“ which the founders Carl Miele and Reinhard Zinkann printed on their first machines - and which characterises Miele to this day.

Miele stands for long-term thinking and planning, continuity of values and goals, good relationships with customers and suppliers, as well as an employee-oriented corporate and leadership culture. Miele does not tolerate human rights violations, exploitative working conditions, discrimination, corruption, or business activities that conflict with the principles described in this Miele Responsible Business Policy (the “Policy”).

2. Purpose & scope

At Miele, responsible business conduct is fundamental to how we operate. This Miele Responsible Business Policy defines our commitments and expectations for respecting human rights, fostering fair and safe workplaces, managing environmental impacts responsibly and conducting business with integrity throughout our global operations. It is the binding internal standard for responsible business conduct. This Policy is adopted at the highest management level by the Executive Board. Accountability for its implementation lies with the appointed Miele Responsible Business Steering Committee, that consists of management representatives from Corporate Sustainability, Human Resources, Legal & Compliance, and Procurement Excellence.

This Policy applies to all Miele-group companies over which Miele & Cie. KG or Miele Beteiligungs-GmbH directly or indirectly exercises control or determining influence.

It applies to all employees, managers, temporary workers, agency workers and other people performing work for Miele, as far as legally permissible. Throughout this policy, “workers” is used as an umbrella term.

Miele expects its suppliers to share the principles outlined in this Policy. For this reason, Miele has established a Supplier Code of Conduct (SCoC), that defines the corresponding rules and requirements that must be met.

2.1 Relationship to Code of Conduct and other Miele rules

This Policy is embedded into the Miele Responsible Business Framework (MRBF) with the following additional core documents:

- The Code of Conduct (CoC), that communicates Miele's values & expectations at a high level. This policy contains the corresponding responsible business requirements
- The Supplier Code of Conduct (SCoC), that contains the binding rules & requirements towards our suppliers
- The “Miele Diversity Policy,” covering non-discrimination and equal opportunities requirements
- The “LkSG Grundsatzklärung” that complies with the requirements of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz LkSG)

The actual implementation outlined within these policies is ensured through a set of internal directives.

3. Commitment & Expectations

3.1 International standards and legal basis

This Policy is based on internationally recognized human rights, environmental, and responsible business conduct standards as well as applicable legal due diligence obligations. Miele recognizes in particular the following frameworks and instruments:

1. International Bill of Human Rights
2. ILO Declaration on Fundamental Principles and Rights at Work and the ILO core conventions
3. UN Guiding Principles on Business and Human Rights
4. OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
5. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
6. UN Global Compact principles
7. United Nations Convention on the Rights of the Child

This Policy supports compliance with applicable human rights and environmental due diligence legislation, including but not limited to the German Supply Chain Due Diligence Act (LkSG), the EU Batteries Regulation and other applicable legal requirements. Where local law and this Policy differ, the stricter requirement applies unless this would violate mandatory local law. In case of conflict, Legal and Compliance must be consulted.

3.2 Child labour and young workers

Miele prohibits child labour. No person may be employed below the age at which compulsory schooling ends or below the legally permitted minimum age; in no case may regular employment begin below 15 years.

Young workers of school age may only work outside of school hours. The total daily time spent on school, work, and commuting may not exceed ten hours; of this, no more than eight hours may be spent working.

Workers under 18 must not perform hazardous work, night work, excessive overtime or work that is likely to harm their health, safety, morals or development.

Age verification procedures must be in place, and proper documentation must be maintained.

3.3 Forced labour, slavery and human trafficking

Miele prohibits all forms of forced or compulsory labour, human trafficking and modern slavery.

Workers must enter employment freely and must be free to terminate employment according to law and contract. Identity documents, personal property, wages or deposits must not be retained to force workers to stay.

Workers must be allowed to leave the workplace at the end of the normal workday.

Recruitment fees, deceptive recruitment, threats, restriction of movement and abusive debt arrangements are prohibited.

3.4 Working conditions, working hours and remuneration

Workers must receive clear information on their employment terms, wages, working hours and benefits in a language they understand.

Working hours, overtime, rest breaks and rest days must comply with applicable law, collective agreements and international standards. Overtime must not be used as a substitute for adequate staffing or adequate regular wages.

1. The regular weekly working hours may not exceed 48 hours, unless stricter legal requirements apply
2. Workers are entitled to adequate rest periods. After six consecutive working days, at least one day off must be granted
3. Overtime must be voluntary. It generally may not exceed twelve hours per week and may not be required on a regular basis

4. Exceptions are permitted only if they are authorized by law or collective bargaining agreements, strictly limited, and objectively justified

Wages must be paid fairly, transparently, regularly, on time and comply with applicable laws, regulations and collective agreements. Any deductions from wages must be lawful, transparent and appropriately communicated.

Wage deductions must not be used as a disciplinary sanction unless expressly permitted by applicable law or an applicable collective agreement and applied fairly and transparently.

Miele recognizes the importance of fair compensation and the role it plays in supporting the wellbeing of workers and their families. Miele considers living wage principles as part of its approach to responsible employment practices.

Workers must receive all legally required social security, insurance and employment-related benefits in accordance with applicable law.

3.5 Occupational health and safety

All Miele entities must provide a safe and healthy working environment and prevent occupational accidents, injuries and illnesses.

Minimum requirements include safe workplaces and work equipment, adequate protective measures against chemical, physical and biological hazards, including risk assessments and appropriate protection for pregnant and breastfeeding women, suitable working-time and rest arrangements to prevent excessive fatigue, emergency preparedness and adequate training/instruction.

Where occupational health and safety risks cannot be eliminated, the responsible entity must provide appropriate personal protective equipment free of charge.

Workers must have free access to clean restroom facilities, drinking water, suitable break areas and, where necessary, hygienic facilities or suitable storage space for food.

Workers and worker representatives must be able to raise health and safety concerns without retaliation.

Contractors and visitors on Miele-controlled sites must be included in site safety management.

3.6 Freedom of association and collective bargaining

Miele respects the right of workers to form, join or refrain from joining trade unions or worker representative bodies and to engage in collective dialogue in accordance with applicable law.

Workers must not suffer discrimination, retaliation, intimidation or harassment due to lawful trade-union membership or worker representation.

Workers must not be incentivized through bonuses or other benefits to refrain from joining or to leave a trade union.

Where local law restricts freedom of association, Miele seeks alternative lawful forms of worker dialogue and representation.

3.7 Humane treatment and disciplinary practices

Miele prohibits corporal punishment, physical, sexual, psychological or verbal abuse, threats, intimidation, bullying, humiliating treatment and other harsh or inhumane treatment.

Disciplinary processes must be fair, documented, proportionate and compliant with applicable law.

Retaliation against workers, complainants, worker representatives or people cooperating in an investigation is prohibited.

3.8 Land, livelihoods, communities and security forces

Miele prohibits unlawful eviction and unlawful deprivation of land, forests or waters where their use secures a person’s livelihood. Sites and projects with potential community impacts must be assessed through a risk management process.

Private or public security forces used for Miele activities or projects must be appropriately selected, instructed and monitored so that they do not violate the prohibition of torture or cruel, inhuman or degrading treatment, injure life or limb, or impair freedom of association.

3.9 Environment-related human-rights risks

Miele prohibits causing harmful soil change, water pollution, air pollution, harmful noise emissions or excessive water consumption where this significantly impairs the natural resources required to secure food and livelihoods, denies access to safe drinking water or sanitation, or harms health.

Miele complies, and requires relevant suppliers through the Supplier Code of Conduct and related due diligence processes to comply

- with applicable obligations connected to mercury-added products, mercury use in manufacturing and mercury waste under the Minamata Convention.
- with prohibitions on production, use and non-environmentally sound handling, collection, storage and disposal of persistent organic pollutants and related waste under the Stockholm Convention.
- with prohibitions and controls on the export and import of hazardous and other wastes under the Basel Convention and applicable waste-shipment rules.

Environmental topics are included here only to the extent they are required by LkSG or directly connected to human rights. Broader environmental strategy is governed by Miele’s environmental management system.

4 Due diligence framework

To ensure requirements towards responsible business are met within Miele’s operations and its supply chain, the Miele Responsible Business Framework contains the following key elements:

4.1 Governance

The Executive Board approves this Policy and receives at least annual reporting on implementation, risk analysis results, material incidents and effectiveness.

The MRBF Steering Committee provides overall oversight. The responsibility for the development and execution of this Policy lies with the appointed Human Rights Officer in the Corporate Sustainability department for Miele’s own business areas as well as the appointed Human Rights Officer in the Procurement Excellence department for the supply chain.

All corporate functions are responsible for the execution of this Policy within their respective processes. The responsibility for executing this Policy within production sites and other local entities lies with the respective management.

4.2 Risk management

Miele anchors its human rights and environmental due diligence obligations in a group-wide, risk-based ESG risk management system. The aim is to systematically identify, assess and prioritize potential risks within its own business operations and along the supply chain, and to derive appropriate measures on this basis.

The risk analysis is carried out regularly, at least annually, and on an ad hoc basis, particularly in the event of changes in business activities or substantiated knowledge of possible violations of human rights or environmental obligations. Corporate Sustainability is responsible for conducting and managing the risk analysis within the company’s own business operations. Responsibility for the risk analysis in the supply chain lies with Procurement

Excellence. For indirect suppliers, an ad hoc risk analysis is conducted where Miele obtains substantiated knowledge of a possible human rights-related or environment-related violation.

The risk analysis follows a two-stage approach In the abstract risk analysis, potential human rights and environmental risks are assessed based on standardized criteria, particularly with regard to country, sector, product, and service risks, while taking into account the Miele Group’s specific procurement structures and production conditions. The assessment is further based on internal and external findings, indications, self-assessments, audit results, and other relevant sources of information. To provide digital support, the Miele Group uses a third party software to consolidate relevant information, systematically process risk indicators, document and transparently manage the risk analysis process.

If the abstract assessment indicates an elevated risk situation, a concrete risk analysis is carried out. In this step, the identified risks are further substantiated and professionally assessed on the basis of additional evidence, self-assessments or audit results. The final risk assessment and the derivation of appropriate follow-up measures are carried out by the respective responsible functions.

4.3 Preventive and remediation measures

Miele identifies and prioritizes preventive measures based on the results of its risk assessment processes. Within its own operations, preventive measures include targeted training and awareness activities to support the implementation of the MRBF.

For production-related processes and sites, existing management systems and certifications contribute to the prevention of human rights-related and environmental risks. In particular, standards such as ISO 45001 for occupational health and safety and ISO 14001 for environmental management support structured processes, controls and continuous improvements.

In the supply chain, the Supplier Code of Conduct constitutes a key preventive measure. It defines the mini-

mum requirements relevant suppliers must meet in the areas of human and labour rights, environmental protection, ethical business conduct and corporate integrity, responsible supply chains, and due diligence obligations. Suppliers acknowledge the principles set out therein as minimum standards for their own business operations and further commit to exercising appropriate efforts to ensure compliance with these standards throughout their own supply chains. Where such a commitment is not yet in place, it must be obtained as a baseline measure. Miele also considers relevant procurement practices, supplier selection, contractual assurances, training and control mechanisms as part of supply chain preventive measures where appropriate.

If significant findings are identified as part of the concrete risk analysis, Miele enters into a structured dialogue with the affected entity or supplier. The aim of this engagement process is to discuss identified gaps, assess existing measures and prepare the necessary follow-up steps. Depending on the nature and severity of the risk, additional measures such as Responsible Business Audits may be conducted to assess the effective implementation of requirements.

If elevated risks, specific indications or actual violations are identified, Miele performs an appropriate assessment, including a root cause analysis. Based on the results, corrective and remedial measures are defined, documented and monitored. Within Miele’s own business area, remedial measures are designed to prevent or end the violation. Such measures include process improvements, additional controls or targeted training. In the supply chain, remedial measures may include audits, corrective action plans, requests for evidence and follow-up reviews with the affected supplier. If risks or violations are not adequately addressed, escalation measures may be examined, up to and including the suspension or termination of the business relationship as a last resort.

Recognizing the special protection needs of children, any identified case of child labour requires a dedicated remediation plan focused on the best interests of the child. Such measures may include the safe removal of the child from work, support for access to education, and appropriate measures to prevent the loss of livelihood or unintended harm to the child and their family.

4.4 Complaints procedure

Miele maintains a complaints mechanism that enables the reporting of human rights-related, environment-related and compliance-related concerns through an independent whistleblower system.

The complaints procedure is available worldwide to all stakeholders in and outside of Miele and allows anonymous reporting where legally permissible. All complaints are assessed by an independent ombudsperson and handled through established investigation and follow-up processes depending on the nature of the complaint. For complaints related to the requirements of this Policy, the Human Rights Officers are involved where appropriate.

The complaints procedure is managed by an independent ombudsperson, who can be contacted as follows:

Dr. Carsten Thiel von Herff, LL.M.
Loebellstraße 4 D
33602 Bielefeld
Tel.: +49 521 557 333 0
Mobile: +49 151 58230321
E-mail: ombudsmann@thielvonherff.de
Reporting platform: www.report-tvh.com
Website: www.thielvonherff.de

The Ombudsperson acts as an independent attorney-at-law. They are impartial and are not subject to any instructions from the company regarding the substantive handling of reported matters. The Ombudsperson is bound by professional confidentiality. Upon request, they will protect the confidentiality of the identity of the reporting person.

4.5 Monitoring, documentation and reporting

Risk assessments, preventive measures, remedial measures and the complaints procedure are reviewed at least annually, as well as on an event-driven basis where necessary. This Policy is reviewed at least annually by the Human Rights Officers. It is updated if risk analysis, complaints, incidents, legal changes or effectiveness reviews show the need for changes. Where appropriate, Miele considers input from workers, worker

representatives and relevant stakeholders in the design, implementation and review of due diligence measures. Significant changes are approved by the MRBF Steering Committee.

To assess the effectiveness of its due diligence processes, Miele periodically reviews the implementation of the MRBF across the organisation. Internal Audit supports this process by conducting risk-oriented, sample-based reviews of selected entities. These reviews assess whether relevant MRBF requirements, responsibilities and controls have been appropriately implemented and documented.

Relevant activities, measures and follow-up actions relating to risk assessment, prevention, remediation and monitoring are documented in a consistent and traceable manner. Documentation is retained in accordance with applicable legal requirements.

The Human Rights Officers are responsible for documentation and internal and external reporting in relation to this Policy.

5. Appendix: Related documents + Changelog

- Miele Code of Conduct
- Miele Supplier Code of Conduct
- Miele Diversity Policy
- LkSG Grundsatzklärung / Human Rights Policy Statement

Date	Version	Changelog
01.07.26	1	Initial version for publication