



WESTWING

Responsible marketing and communication policy

DECEMBER 2021

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Introduction

Westwing's mission is: To inspire and make every home a beautiful home. We are the European leader in inspiration-based Home & Living eCommerce and inspire our loyal home enthusiast customers with a curated product selection in our 'shoppable magazine' and combine that with gorgeous content. In our organic marketing model we generate 94% of our traffic through our own channels. Accordingly we allocate most of our marketing investments into organic marketing and support these investments with paid channels. We genuinely care about our customers, our colleagues, and our partners. Our respect for the individuals and their rights is key to our overall approach and we always strive to be open, honest, direct and reliable as also detailed in our Code of Conduct.

To enhance our Code of Conduct and further specify our approach to marketing and communication we have created this Responsible Marketing and Communication policy. Our goal is to educate our employees, inform our customers and place our company values at the heart of our communication and marketing strategies. Through this policy we want to further highlight our overall commitment to honest and transparent communication, child protection, diversity and inclusion.

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Scope

We have created the Responsible Marketing and Communication policy for all that are involved with marketing, sales, promotion and communications within the Westwing Group across all countries. The scope of our policy also extends to external media partners who support us by providing media opportunities for marketing and advertising.

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Basic Principles

Our marketing and communication activities should abide by the following basic principles:

- comply with the relevant European and national regulatory frameworks and legal requirements;
- be ethical, legal, honest, truthful and apolitical;
- be easy to substantiate;
- respect the human being, individual beliefs and lifestyle choices;
- be socially responsible;
- be responsible when promoting environmental benefits;
- be consistent with our company values and reflect generally accepted contemporary standards of good taste and decency;
- avoid representation of our consumers, employees and partners in a manner that is idealistic or objectified;
- not include harmful, offensive, or derogatory stereotypes;
- be clearly distinguishable in its commercial nature.

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Guidelines

Transparency and honesty

- **Transparency:** We use clear marketing communications that do not mislead consumers.
- **Labeling:** We comply with product labeling laws in all the markets in which we operate. Our products are clearly and comprehensively labeled, beyond legal requirements where relevant, and display accurate information regarding their attributes, so that consumers can make informed choices.
- **Honest claims:** We communicate about our products and their ingredients honestly and accurately. We do not make misleading comparisons between our products and other products.
- **Pricing:** We provide our prices transparently to our customers.
- **Substantiation:** We make every effort to substantiate the claims made with respect to the products offered to our customers.

Child protection

- **Advertising to children:** Westwing Group does not directly target children under the age of 12. While Westwing is not able to fully control its organic marketing approach, we commit to taking all reasonable measures to prevent our marketing content unintentionally reaching children under 12.
- **Promotional activities:** We refrain from promotional activities that are specifically directed to children under 12.
- **Respecting parental authority:** We do not take advantage of children's imagination or inexperience or undermine their parents' authority through marketing messages.
- **Employing children:** We refrain from the employment of children.

Diversity and inclusion

- **Diversity:** Our marketing communication aims to be truly diverse.
- **Inclusion:** Westwing stands for inclusion and no form of discrimination is tolerated in our marketing communication or elsewhere. This includes age, sexual orientation, religious beliefs, disability, and racial discrimination.
- **Political content:** We also take care to remain apolitical and avoid offending individuals or groups through our marketing and advertising content.

Social media interaction

We place a high priority on ensuring that the digital environment where we place our content aligns with our image, values, and messaging in order to safeguard our Company's reputation.

- **Quality:** It is our expectation that each vendor has responsibility to monitor and remove unacceptable content, comply with all applicable laws and regulations, and operate in accordance with industry standards.
- **Respect:** Our content is about our business, our products, our people, and the communities where we do business. We will work with media platforms that conduct business responsibly and respect users' privacy.
- **Transparency:** Acceptable content and industry standards throughout the digital media supply chain are important to both advertise appropriately, as well as for audiences to know what to expect. We strive to work with platforms and ecosystems that are transparent in standards and content.
- **Enforcement:** As we are made aware of violations of this policy, we will address the situation with the platform and take appropriate action, which may include a temporary or indefinite suspension of advertising and media investment.

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Consumer Data Privacy

We conform to our data privacy rules and policies as published on our websites covering all aspects relating to the collection and use of information of Westwing customers. We ensure that we will act transparently, protect and secure the data, respect the rights of our customers and verify compliance with all legal requirements.

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Compliance

We constantly work to comply, and exceed when possible, with all applicable laws and regulations in all the markets in which we operate.

We establish and maintain appropriate compliance programs to ensure management and employees' involvement in, and oversight of, Responsible Marketing and Communication and allocate appropriate resources to address required actions.

As part of compliance programs, all individuals are encouraged to report any instances of marketing or advertising that violate the elements stated in this policy. All reports may be directed to Westwing Group's Marketing Department.

The Chief Marketing Officer of the Westwing Group is responsible for compliance with all responsible marketing content creation and distribution, reporting directly to the Chief Executive Officer. Oversight of marketing legal compliance is provided by the Westwing Group legal team.

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Communication

This policy is available to Westwing Group employees through our internal internet portal and externally on our corporate website.

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Validity

This policy is reviewed periodically and if necessary updated. Any breach against this policy will be reported accordingly.



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