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Miele AS – redegjørelse for aktsomhetsvurderinger 2025

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Vedlegg 1: Miele Group MRBF

1. Innledning

Denne redegjørelsen er utarbeidet i henhold til åpenhetsloven av 2022, innført av norske styresmakter knyttet til virksomheters åpenhet og arbeid med miljø, grunnleggende menneskerettigheter og anstendige arbeidsforhold.

Redegjørelsen inneholder følgende hovedpunkter.

- En generell beskrivelse av virksomhetens organisering og driftsområde
- En generell beskrivelse av virksomhetens retningslinjer og rutiner.
- Opplysninger om faktiske negative konsekvenser og vesentlig risiko for negative konsekvenser
- Tiltak som virksomheten har iverksatt eller planlegger å iverksette inklusive forventede resultater for å stanse tilsvarende.

2. Virksomhetens organisering og driftsområde

Miele AS er et datterselskap av Miele Group, som er lokalisert i Gütersloh, Tyskland. Miele Group har vært et uavhengig familieeid selskap siden etableringen i 1899 og er like forpliktet til sine eiere, ansatte, kunder, leverandører, miljøet og samfunnet. Selskapet fokuserer på produksjon av husholdningsapparater til kjøkkenet, vaskerommet og for gulvpleie, samt apparater for bruk i profesjonell og kommersiell drift og ved medisinske fasiliteter ("Miele Professional"). Miele tilbyr produkter med høy standard innenfor holdbarhet, ytelse, brukervennlighet, energieffektivitet, design og service. Mieles strategiske visjon er å være bransjens mest foretrukne premium merkevare i relevante markeder.

Miele står for langsiktig tenkning og planlegging, kontinuitet i verdier og mål, gode relasjoner til kunder og leverandører, samt en medarbeiderorientert bedrifts- og lederkultur. Miele Group har om lag 21 000 ansatte over hele verden.

Dette er i samsvar med det ledende prinsippet «Immer Besser» som gründerne Carl Miele og Reinhard Zinkann trykket på sine første maskiner – og som kjennetegner Miele den dag i dag.

Miele AS sysselsetter ca. 120 årsverk innenfor følgende funksjoner; salg, markedsføring, reparasjonsservice, administrasjons- og støttefunksjoner som IT og HR. Virksomheten i Norge medfører ikke vesentlige utslipp til det eksterne miljø. Miele Group er selskapets hovedleverandør av produkter. Miele Group utgir hvert annet år en omfattende rapport om bærekraft og samfunnsansvar («Sustainability report»), som er tilgjengelig på de norske hjemmesidene.

Bærekraft hos Miele - Immer Besser | Miele

Miele Group har innført LkSG (The German Supply Chain Due Dilligence Act) som trådte i kraft 1. januar 2023. Miele AS følger konsernets retningslinjer for samfunnsansvar og bærekraft.

3. Forholdet mellom Miele AS og Miele Groups aktsomhetsarbeid

Miele AS er en del av Miele Group og følger konsernets overordnede rammeverk for ansvarlig virksomhetsstyring, Miele Responsible Business Framework (MRBF). Rammeverket omfatter blant annet Miele Responsible Business Policy, Miele Group Code of Conduct, Supplier Code of Conduct, Miele Diversity Policy og konsernets policy og prosesser knyttet til menneskerettigheter og aktsomhetsvurderinger (se vedlegg: Miele Group_MRBF_2025).

MRBF bygger på internasjonalt anerkjente prinsipper og standarder for menneskerettigheter og ansvarlig næringsliv, herunder FNs veiledende prinsipper for næringsliv og menneskerettigheter, OECDs retningslinjer for flernasjonale selskaper, ILOs kjernekonvensjoner og FNs Global Compact. Rammeverket beskriver ansvar og styring, risikobaserte aktsomhetsvurderinger, forebyggende tiltak, korrigerende og gjenopprettende tiltak, varslings- og klageordninger samt dokumentasjon, overvåking og rapportering.

Miele Groups risikovurderinger gjennomføres regelmessig og omfatter både egen virksomhet og leverandørkjeden. Vurderingene tar blant annet hensyn til land-, bransje-, produkt- og tjenesterisiko samt informasjon fra interne og eksterne kilder, egenerklæringer, revisjoner og andre relevante kontrollaktiviteter. Dersom det identifiseres forhøyet risiko eller konkrete indikasjoner på brudd, gjennomføres nærmere vurderinger og relevante forebyggende eller korrigerende tiltak.

Miele AS benytter konsernets rammeverk og risikovurderinger som en viktig del av grunnlaget for selskapets egne aktsomhetsvurderinger etter den norske åpenhetsloven. Dette gjelder særlig for produkter og leverandørforhold som håndteres gjennom Miele Group. Samtidig foretar Miele AS egne vurderinger av forhold som er særskilt relevante for den norske virksomheten, herunder egne ansatte, lokale leverandører og samarbeidspartnere (distribusjonsledd).

Miele AS' redegjørelse etter åpenhetsloven må derfor ses i sammenheng med Miele Groups konsernfelles retningslinjer og aktsomhetsprosesser. Den norske redegjørelsen beskriver særskilt hvordan disse prinsippene er anvendt og fulgt opp i Miele AS, hvilke vesentlige risikoer som er vurdert som relevante for den norske virksomheten, og hvilke tiltak som er gjennomført eller planlagt.

Dette bygger direkte på konsernmaterialet, som beskriver MRBF som et bindende internt rammeverk for ansvarlig forretningsdrift og fastsetter ansvar for risikovurdering, forebygging, avhjelp, klageordninger og rapportering. Samtidig samsvarer teksten med strukturen i den norske redegjørelsen, som allerede skiller mellom konsernets leverandørkjede og Miele AS' egne lokale forhold og tiltak.

4. Retningslinjer og vurderinger

I Miele AS jobber vi kontinuerlig med å etterleve de kravene som åpenhetsloven stiller til oss som virksomhet.

Retningslinjer og planer for aktsomhetsvurderinger er forankret i ledelsen i Miele og omfatter hele virksomheten fra leverandørkjeden til distribusjonsleddet. Ansvar for å gjennomføre vurderinger er plassert i de ulike funksjonene i Miele og områdene eier sine prosesser med et klart mandat og en forventing i forhold til prosessen.

Aktsomhetsvurderingene hjelper oss som selskap å unngå negativ påvirkning og skade på mennesker, samfunn og miljø, og til å rette opp skader som måtte oppstå. Gjennom aktsomhetsvurderingene etterstreber vi å kartlegge, forebygge, begrense og gjøre rede for hvordan vi både håndterer risiko for negativ påvirkning og retter opp eventuelle skader.

Vurderingene gjennomføres i tråd med Mieles bærekraftfokus og forventning innenfor områdene miljø (utslipp, forbruk, resirkulering, biodiversitet), sosialt ansvar (menneskerettigheter og arbeidstakerrettigheter) og ansvarlighet (etikk, skatt, antikorrupsjon, konkurranselovgivning, forbrukerinteresser og åpenhet).



Disse områdene er også i tråd med OECDs hovedområder for forretningsdrift ref. OECDs veileder for Aktsomhetsvurderinger for ansvarlig næringsliv.



I Miele tror vi på trygge, langsiktige samarbeid, hvor vi hjelper hverandre til et felles mål om ansvarlighet i forhold til miljø, grunnleggende menneskerettigheter og anstendige arbeidsforhold.

Dokumentasjon og sertifikater: [Certificates (miele.com)]

4.1 Etiske forhold

Alle ansatte i Miele AS er underlagt Mieles etiske retningslinjer som likeledes beskriver retningslinjer for Miele AS, så som «Policy for mangfold og like muligheter» og «Policy for miljø, helse og sikkerhet». Tilhørende retningslinjene gjennomføres regelmessig opplæring og kursing innenfor følgende områder:

- Miele group Code of Conduct
- Antitrust and Competition Law
- Data Protection
- Information Security

Opplæringen gjennomføres og følges opp i Mieles digitale Learning Management System og fornyes løpende i tråd med gjeldende forskrifter og retningslinjer.

4.2 Sosialt ansvar

Miele erkjenner at det er en kontinuerlig risiko for sosialt uakseptable forhold i alle sektorer, bransjer og jurisdiksjoner, spesielt i forhold til råvareinnhenting og produktproduksjon. Følgelig har Miele implementert forbedrede tiltak for å håndtere forhold knyttet til grunnleggende menneskerettigheter og anstendige arbeidsforhold.

Miele AS forbyr misbruk og diskriminering i arbeidsstyrken og jobber kontinuerlig med å sikre at gjeldende lover og forskrifter overholdes og at det utføres relevant oppfølging og kontroll for å forhindre brudd på grunnleggende menneskerettigheter og anstendige arbeidsforhold i arbeidsstyrken.

Miele AS støtter opp om retten til fri fagorganisering og andre former for demokratisk valgt arbeiderrepresentasjon. Vi skal involvere arbeiderrepresentanter og andre relevante interessenter i vårt arbeid med bærekraftig forretningspraksis. Det avholdes regelmessige møter med arbeidstakerrepresentanter og fagforening samt forretningspartnere og leverandører. I tilfeller der risikoer identifiseres vil det umiddelbart avholdes eksplisitte møter rundt dette.

Hos Miele gjelder prinsippene om like muligheter og respekt for alle ansatte – uavhengig av nasjonalitet, hudfarge, kjønn, religion, seksuell legning eller fysiske funksjonshemminger. Mangfold beriker selskapet vårt og er en viktig konkurransefaktor for oss.

Human rights - Our positioning (miele.com)

4.3 Lønn og anstendige arbeidsforhold

Det er en vurdert risiko forbundet med arbeidsbelastning for enkelte fagområder og selskapet har etablerte rutiner for oppfølging, støttet og automatisert i selskapets lønns- og personalsystem.

Miele AS anser lønn å leve av («living wage») som en del av vurderingen av anstendige arbeidsforhold. Ved våre aktsomhetsvurderinger skal risiko knyttet til lønnsnivå og arbeidstakernes mulighet til å oppnå en anstendig levestandard inngå der dette er relevant. Dersom det identifiseres vesentlig risiko på området, skal denne følges opp som en del av Mieles risikobaserte leverandør- og partneroppfølging.

4.4 Miljø

Vi jobber for at produktenes totale miljøbelastning skal være minst mulig. Dette gjelder fra hvilke råvarer vi benytter i produksjonen (miljøvennlig stål, resirkulert plast), hvor lite energi og kjemi du trenger å benytte under bruk, samt muligheten for å reparere inkl. graden av gjenvinning og resirkulering av produktet. I tillegg benytter vi bærekraftig emballasjen, miljøvennlig transport og våre ansatte og leverandører skal oppleve anstendige arbeidsforhold.

For å sikre at miljøstandarder oppfylles, er en av kjernekriteriene i vår leverandørvurdering om en leverandør har satt opp et kvalifisert miljøstyringssystem. Vår vurdering ser også på om leverandøren bruker ressurser på en bærekraftig måte og overholder gjeldende internasjonale og nasjonale miljø- og klimalover.

Sustainability at Miele

5. Leverandørkjeden

Miele AS forstår viktigheten av å ha en omfattende og gjennomsiktig leverandør- og forsyningskjede og streber etter å sikre at leverandørene ikke engasjerer seg i støtende, utnyttende eller ulovlige aktiviteter. Vi forstår at det i denne delen av virksomheten vil være en vurdert risiko for negative konsekvenser knyttet til miljø, grunnleggende menneskerettigheter og anstendige arbeidsforhold.

For å sikre fredelig, rettferdig og bærekraftig bruk av våre globale ressurser, er Miele Group opptatt av å samarbeide med leverandører som overholder allment aksepterte sosiale og miljømessige standarder og som ikke opprettholder forretningsforbindelser med selskaper som er etisk tvilsomme. Miele Group er blant annet forpliktet til prinsippene i UN Global Compact, Applia Code of Conduct og er et av kun 12 selskaper i Tyskland som var sertifisert i henhold til den tidligere SA8000 sosial standard. Miele forventer at deres leverandører innlemmer passende tiltak med hensyn til sine direkte leverandører for å overholde gjeldende nasjonale og internasjonale konvensjoner, forskrifter, retningslinjer og lover.

Leverandøren er kontinuerlig forpliktet til å sikre at de opererer på en måte som er konsistent.

Miele Group årlige leverandørrisikoanalyse fokuserer på relevante varegrupper og direkte leverandører med minst EUR 10 000 i årlig innkjøpsvolum. Denne beløpsgrensen er anvendes som et ordinært screeningskriterium, men ekskluderer ikke leverandører eller forretningspartnere der land-, bransje-, produkt-, hendelses- eller menneskerettighetsrisiko tilsier nærmere vurdering.

Miele AS har kartlagt våre lokale leverandører i forhold til risiko og aktsomhetsvurderinger. For våre eksisterende leverandører skal det signeres en bekreftende leverandørerklæring. Ved anskaffelser vurderes potensiell risiko og vesentlighet forbundet med sosiale, miljømessige og innovative aspekter som viktige utvelgelseskriteria. For ytelser med spesifikke miljømessige eller sosiale egenskaper, vil det i de tekniske spesifikasjonene, tildelingskriteriene eller kontraktsvilkårene vurderes å kreve bekreftende dokumentasjon eller sertifikat for ulike kvalitetsstandarder vedlagt som bevis for slike egenskaper.

Suppliers (miele.com)

6. Distribusjonsleddet

Miele AS forstår viktigheten av å ha en åpen og bærekraftig distribusjon og vi arbeider kontinuerlig for å sikre at våre samarbeidspartnere ikke engasjerer seg i støtende, utnyttende eller ulovlige

aktiviteter. Vi forventer at våre distribusjonspartnere overholder miljømessige og sosiale standarder basert på kjernekravene i de internasjonale standardene ISO14001 og SA 8000. Som leverandør bekrefter Miele tilsvarende med sine partnere ved signerte leverandørerklæringer.

Samarbeidet inneholder kontraktsfestede parametere, samtidig som vi gjennom åpenhet og kommunikasjon med samarbeidspartnere, søker etter muligheter for å bidra til relevant kompetanseheving som setter våre partnere i stand til å etterleve våre krav til forhold i distribusjonsleddet. På denne måten legger vi grunnlaget for godt samarbeid med våre partnere som viser særlig vilje og evne til å jobbe med positiv utvikling for mennesker, samfunn og miljø i distribusjonsleddet.

7. Risiko og tiltak

Dersom det forekommer mindre alvorlige avvik, gir vi leverandør eller samarbeidspartner muligheten til å rette opp i feilen innen en gitt tidsfrist. Der virksomheten har forårsaket eller bidratt til faktisk negativ påvirkning, skal Miele sørge for eller samarbeide med partneren om egnet gjenoppretting. Miele AS forbeholder seg retten til å gjennomføre nødvendige sanksjoner, dersom leverandøren eller eventuelle underleverandører ikke etterlever de gjeldende vilkårene. Sanksjonen skal være egnet til å påvirke leverandøren eller underleverandøren til å oppfylle vilkårene.

I konsernets risikovurdering for 2024 ble det ikke identifisert prioriterte menneskerettighets- eller miljørisikoer i Mieles egen virksomhet, sett i lys av etablerte retningslinjer, prosesser og kontrollmekanismer.

I leverandørkjeden ble det imidlertid identifisert og prioritert risiko knyttet;

- til manglende etterlevelse av krav til helse, miljø og sikkerhet
- risiko for skadelig forurensning av jord, vann og luft.

Miele AS vurderer disse konsernrisikoene opp mot produkter og leverandørforhold som er relevante for den norske virksomheten, og kombinerer dette med egne lokale aktsomhetsvurderinger. Disse risikoområdene inngår, sammen med Miele AS' egne lokale vurderinger, i grunnlaget for prioritering av oppfølging og forebyggende tiltak.

Gjennom aktsomhets- og risikovurderingene ble følgende områder identifisert i 2025:

- seksuell trakassering
- overholdelse av arbeidstidsbestemmelsene
- lønnsnivå og arbeidstakernes mulighet til å oppnå en anstendig levestandard

Det ble ikke avdekket faktiske negative konsekvenser, men likevel gjennomført forebyggende arbeid blant annet gjennom deling av informasjon om risiko

8. Informasjon og innsyn

Enhver kan skriftlig henvende seg angående hvordan virksomheten håndterer faktiske og potensielle negative konsekvenser, både generelt og knyttet til en bestemt vare eller tjeneste. Slike henvendelser vil behandles i tråd med de gjeldene retningslinjer og besvares innen tre uker, evt. med en utvidelse til to måneder.

Lovdata: https://lovdata.no/lov/2021-06-18-99/§6

I den grad innsynsretten er relatert til private eller personlige forhold, herunder GDPR eller konkurransesensitive områder, vil det medføre begrensninger, dette gjelder samtidig dersom kravet ikke gir tilstrekkelig grunnlag for å identifisere hva det gjelder, er åpenbart urimelig, gjelder personlige forhold eller visse konkurransesensitive opplysninger.

Nesbru, 6. juni 2026

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Vedlegg: Miele Group_MRBF_2025

Miele Responsible Business Framework (MRBF)

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

Miele AS is a Norwegian subsidiary and part of the Miele Group. The company has 115 employees occupied within sales, service, admin and support functions, many of them located at the office and Miele Experience Center at Nesbru in Asker. Miele AS operations in Norway do not result in significant emissions to the external environment and the company adhere to the Group guidelines for corporate social responsibility and sustainability.

Business 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 Grundsatzerklärung" 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 com-pany's own business operations. Responsibility for the risk analysis in the supply chain lies with Pro-curement 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, docu- ment and transparently manage the risk analysis process. If the abstract assessment indicates an ele- vated 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 pro-cesses. 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 ISO45001 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 minimum 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 inputfrom 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 Miele Group Code of Conduct

This Code of Conduct reflects both the past and future approach to business conduct within the Miele Group.

In keeping with our corporate philosophy, we as an independent family-owned company steeped in tradition have an obligation towards our employees, our customers and our suppliers as well as towards the general public.

In the light of these obligations, the actions of each individual employee of the Miele Group must subscribe to the following mandatory guidelines of the Code of Conduct:

1 Human dignity is at the core of all actions. This includes, among others, support for principles aimed at protecting human rights as enshrined in the UN's Global Compact along with pertinent social and environmental standards. Miele applies “Miele Responsible Busi-ness Framework (MRBF)” evaluation criteria.

2 Faced with worldwide competition for orders, Miele relies on the quality and user convenience of its products and services which are made available at reasonable prices. Through the principles of fair trade, we support global efforts aimed at preventing any distortion of competition through corruption. This includes the strict adherence to competition and anti-trust legislation.

3 Each employee of the Miele Group must comply with the laws and regulations of each country, and must always act in such a manner as to avoid any harm to the standing andthe reputation of the Miele Group.

4 It is forbidden for any employee of the Miele Group to grant or accept gifts or other bene-fits unless such actions would be deemed impolite and in as far as such actions cannot be construed as resulting in any obligations. It is strictly forbidden to offer gifts or other be-nefits to persons in public office.

5 It is forbidden for all employees of the Miele Group to convene or participate in events which could be deemed as being ethically or morally objectionable and result in damage to the reputation of the Miele Group.

6 Each employee of the Miele Group is under obligation to disclose conflicts of interest which may result in a lack of objectivity in their business activities.

7 Donations and sponsoring contracts are only permissible in compliance with legal stipula-tions. Sponsoring contracts must be on a quid pro quo basis and must include measures to promote the Miele brand.

8 To nurture correct corporate behaviour, a self-learning programme entitled 'Code of Con-duct of the Miele Group' has been created. Alongside certain groups of employees placed under special obligation, each employee of the Miele Group must complete the 'Code of Conduct of the Miele Group' in order to be able to reliably comply with the rules of this code.

9 Should doubts persist regarding appropriate behaviour, each employee must seek the ad-vice of:

- His or her superior.
- The head of the personnel unit responsible.
- The Chief Auditor.

The employee will then receive behavioural advice which must be documented in writing.

10 Contraventions of the Code of Conduct can be reported by any employee to the ombuds- man of the Miele Group. The identity of the whistle-blower will be kept confidential by the ombudsman. The contact data of the ombudsman are published on the Miele Intranet.

11 Violations of this Code of Conduct may result in civil or criminal prosecution with con-sequences for the employment contract of the person concerned.

A copy of this Code of Conduct must be issued to new employees on joining the company.

6 Miele Diversity Policy

Introduction/Preface

This Policy describes Miele’s principles and objectives only. Applicable legal, collective bargaining, companyspecific and contractual provisions remain unaffected.

6.1 Purpose

At Miele, diversity, equal opportunity and responsible business conduct are important elements of our corporate culture and long-term business success. As a globally operating family-owned company, Miele values different perspectives, experiences and backgrounds that contribute to collaboration, innovation and sustainable business development.

Miele is committed to fostering a respectful and inclusive working environment in which people are treated fairly, with dignity and respect and are able to contribute their skills and perspectives.

This Policy supports Miele’s commitment to responsible business conduct and is aligned with applicable legal requirements, internationally recognized human rights and labour standards, and Miele’s internal principles and policies.

6.2 Scope

This Policy applies to all Miele employees worldwide, managers, temporary workers, agency workers and other people performing work for Miele, as far as legally permissible. This Policy shall be interpreted in accordance with the Miele Responsible Business Policy. Where mandatory local law requires otherwise, mandatory local law shall prevail.

6.3 Our Commitment

Miele is committed to equal opportunity and fostering a respectful and inclusive working environment.

Miele seeks to:

- promote a working environment in which different perspectives, experiences and backgrounds are valued,
- support fair and equal opportunities throughout employment-related processes,
- foster respectful collaboration and a professional working culture,
- contribute to an environment in which individuals are treated fairly and with respect,
- support a workplace culture in which people can contribute without fear of discrimination, harassment or retaliation.

Miele seeks to ensure that employment-related decisions, including recruitment, compensation, training, development, promotion and termination of employment, are made with due regard to qualifications, skills, performance and legitimate business-related requirements.

6.4 Respectful and Inclusive Working Environment

Miele promotes a working environment characterized by mutual respect, professionalism, collaboration and trust. Different perspectives, experiences and ideas contribute to effective collaboration and support Miele's ability to operate successfully in international markets and diverse business environments. Miele considers respect, fairness and non-discrimination to be essential elements of its corporate culture and business relationships. Miele supports conditions that foster constructive dialogue, collaboration and consideration of different perspectives.

6.5 Equal Opportunity and Non-Discrimination

Miele is committed to applicable legal requirements relating to the prevention of discrimination and supports their implementation throughout the company. Characteristics may include, for example:

- age
- Sex and Gender
- gender
- nationality
- ethnic or social origin
- disability or health status
- religion or belief
- sexual orientation,
- marital, family or caregiving status
- political opinion
- union membership
- or any other characteristic protected under applicable law.

Distinction, exclusion or preferential treatment that is not based on legitimate business or job-related requirements may constitute discrimination. Miele supports equal opportunity and fair working conditions in accordance with applicable legal requirements.

6.6 Prevention of Harassment and Inappropriate Conduct

Miele supports conditions that promote compliance with legal requirements relating to protection from discrimination, harassment and comparable forms of misconduct. Applicable legal definitions and requirements shall apply. Miele supports a working environment characterized by respect, professionalism and mutual appreciation.

6.7 Roles and Responsibilities

The continued development of a respectful and inclusive working environment is supported by various corporate functions. Managers play an important role in supporting equal opportunity, fair treatment and respectful collaboration within their areas of responsibility. Relevant functions, including People & Organization, Compliance and Management functions, support the implementation and continuous development of this Policy.

6.8 Reporting Concerns

Miele provides reporting mechanisms through which concerns may be raised in accordance with applicable legal and organisational requirements. Miele observes applicable legal requirements relating to the protection of individuals who raise concerns in good faith.

6.9 Awareness and Training

Miele supports awareness and understanding of the principles set out in this Policy through appropriate communication, learning and training measures. Such measures may be adapted to local requirements, business needs and organizational structures

7 Policy Statement on the Human Rights Strategy of the Miele Group

(pursuant to Section 6(2) of the German Supply Chain Due Diligence Act (LkSG))

7.1 Our commitment to respecting human rights

As an internationally active family-owned company, Miele stands like few other companies for high-quality domestic and commercial appliances and is renowned for reliable and durable products. Re-spectful and responsible treatment of employees and suppliers are among the company's firmly heldvalues. Respect for human rights is a matter of course for Miele in all business activities and an essential characteristic of its corporate culture. Miele therefore commits to respecting human rights, to fair and safe working conditions, and to responsible and legally compliant conduct in its own business area and in the supply chain.

This Policy Statement is part of the Miele Responsible Business Framework (MRBF). The Framework comprises our commitments and expectations for responsible business conduct in our own business area and towards business partners worldwide. The core of the MRBF is the Miele Responsible Business Policy, which forms the binding internal standard for responsible business conduct at Miele.

The principles, requirements and governance processes described therein apply to all Miele-group companies over which Miele & Cie. KG or Miele Beteiligungs-GmbH directly or indirectly exercises control or determining influence. For suppliers, the Miele Supplier Code of Conduct, as another component of the MRBF, sets out the corresponding binding expectations and requirements.

Standards and requirements The MRBF is based on international standards, in particular the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the ILO core labour standards, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the principles of the UN Global Compact, the UN Convention on the Rights of the Child, and the human rights-related and environment-related requirements of the LkSG.

Miele expects employees, managers and its direct and indirect suppliers along the entire value chainto respect human rights, avoid risks and cooperate in the implementation of appropriate preventive and remedial measures. This includes in particular:

- the prohibition of child labour, forced labour, slavery, human trafficking and other forms of in voluntary work;
- fair, transparent and legally compliant working conditions, working hours, remuneration and social benefits;
- safe and healthy working conditions and effective measures to prevent occupational accidents and work-related illnesses;
- respect for freedom of association, the right to employee representation and collective dialogue;
- protection against discrimination, violence, harassment, intimidation, retaliation and inappropriate disciplinary measures;
- the prevention of unlawful land acquisition or unlawful deprivation of land, respect for lively hoods and the human rights-compliant use of security forces;
- compliance with the environment-related obligations under the LkSG, particularly in connection with harmful environmental changes, mercury, persistent organic pollutants and hazardous waste.

The detailed requirements are described in the Miele Responsible Business Policy, in internal rules and processes, and in the Supplier Code of Conduct.

7.2 Risk management and priority risks

Miele anchors human rights-related and environment-related due diligence obligations in a group-wide, risk-based ESG risk management system. The aim is to systematically identify, assess and prioritize potential and actual risks in its own business area and in 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 theevent of significant changes in business activities, new projects or substantiated knowledge of possible violations of human rights-related or environment-related obligations. Where corresponding indications exist, indirect suppliers are also included in the risk analysis. The assessment is conducted based on standardized criteria, in particular country, sector, product and service risks, while directly taking into account the Miele Group's company-specific procurement structures and production conditions, as well as on the basis of internal and external findings, reports, self-assessments, audit results and other suitable information.

The risk analysis carried out for the 2024 financial year did not identify any priority human rights-related or environment-related risks in Miele's own business area, considering the rules, procedures and control mechanisms already implemented at Miele. Human rights-related and environment-related risks were identified, assessed and prioritized for direct suppliers. The priority risks identified in the supply chain were the risk of non-compliance with occupational health and safety requirements and harmful soil, water and air pollution. The results of the risk analysis form the basis for the risk-based continuation and further development of existing preventive and control measures.

7.3 Preventive and remedial measures

Miele derives preventive measures from the results of the risk analysis. In its own business area, these include targeted training and awareness-raising measures, the integration of requirements into relevant processes, and existing management systems and certifications, such as ISO 45001 for occupational health and safety and ISO 14001 for environmental management.

In the supply chain, the Supplier Code of Conduct is a key preventive measure. It describes the expec-

tations placed on suppliers with regard to human and labour rights, the environment, integrity, responsible supply chains and due diligence obligations and is integrated into cooperation with relevant suppliers on a risk-

based basis. Depending on the risk situation, dialogue formats, self-assessments, evidence, audits or other control and support measures may be used.

If elevated risks, specific indications or actual violations are identified, Miele assesses the matter, analyses the root causes and defines appropriate remedial measures. In its own business area, these measures are aimed at preventing or ending violations. In the supply chain, Miele generally works to end orminimize risks or violations together with the affected supplier, in particular through corrective action plans, evidence and follow-up assessments. Suspension or termination of the business relationship is considered as a last resort if risks or violations are not adequately addressed.

If child labour is identified, the special need to protect children requires a specific remediation plan focused on the best interests of the child. This may include the safe removal of the child from work, access to education and appropriate measures to avoid unintended negative consequences for the child and the child's family.

7.4 Complaints procedure

Miele maintains a complaints procedure through which internal and external persons worldwide can report indications of human rights-related or environment-related risks and violations as well as compliance-related concerns. Reports may be made through a whistleblower system operated by an independent third party and may also be submitted anonymously where legally permissible.

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 Om-budsperson is bound by professional confidentiality. Upon request, they will protect the confidentiality of the identity of the reporting person.

Miele protects reporting persons against disadvantage or retaliation. Incoming reports are reviewed and, depending on their content, processed through established investigation and follow-up procedures.

For reports relating to the Miele Responsible Business Policy, the Human Rights Officers responsible are involved. The procedure is governed transparently by publicly available rules of procedure, which define the exact process, timelines and responsibilities

7.5 Governance, effectiveness and reporting

The Executive Board issues this Policy Statement and receives reports at least annually on the imple-mentation of human rights-related and environment-related due diligence obligations, the results of the risk analysis, significant incidents and the effectiveness of the measures.

Responsibility for the development and implementation of the Miele Responsible Business Policy lies with the Human Rights Officers in Corporate Sustainability for Miele's own business area and in Pro-curement

Excellence for the supply chain. The Miele Responsible Business Steering Committee sup-ports the further development of the Framework and approves significant changes. The operationalfunctions and local responsible persons implement the requirements in their respective processes and areas of responsibility.

Risk analyses, preventive and remedial measures and the complaints procedure are reviewed regularly, at least annually, and on an ad hoc basis for their effectiveness. Relevant activities and decisions are documented in a traceable manner and reported within the framework of the legal requirements. This Policy Statement is reviewed annually and on an ad hoc basis and updated as necessary.

Miele_AS_åpenhetsloven_redegjørelse_2025

Final Audit Report 2026-08-13

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