

LUHTA HUMAN RIGHTS COMMITMENT

This Human Rights Commitment describes L-Fashion Group's (hereinafter "Luhta Group") commitment to respect all internationally recognized human rights as well as our approach to human rights due diligence. Luhta Group also requires its entire value chain to abide by the this commitment. This Human Rights Commitment has been integrated into the everyday business operations at Luhta. All business processes and decisions by managers and senior managers of the company are based on compliance with Luhta Group's Code of Conduct and its appendixes.

Whereas this Human Rights Commitment is our highest-level commitment, and it outlines our approach to respecting and upholding human rights, our standards on employment conditions throughout our value chain are further detailed in the separate Labour Rights Policy, which is more informative for educational purposes. Anchored on Luhta's mission and values, we aim to create timeless design and products which last from one generation to another. We always seek more sustainable ways to produce our products to allow our customers to make more sustainable choices. Human rights are an integral part of Luhta Group's overall sustainability approach.

Luhta Group is committed to respecting all internationally recognised human rights and we also expect this from our business partners. This commitment encompasses adherence to the following:

- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- ILO Declaration of Fundamental Principles and Rights at Work
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination Against Women
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance
- UN Global Compact – Ten Principles
- UN Sustainable Development Goals
- UN Convention Against Corruption
- Amfori Business Social Compliance Initiative's responsible procurement principles
- Rio Declaration on Environment and Development

More specifically, Luhta Group is committed to respecting, and ensuring that our business partners respect, the human rights of individuals belonging to specific groups or populations that require particular attention (e.g. women, children, indigenous people, minorities, persons with disabilities, migrant workers and their families), where they may be at heightened risk of becoming vulnerable or marginalised if adversely impacted by our or our business partners' activities.

Luhta Group also commits to respecting, and ensuring its business partners also respect, the human rights of particular relevance to communities' livelihoods and health, including the right to water and the ownership or use of land and natural resources.

Futhermore, Luhta Group will not tolerate threats, intimidation, violence, punitive action, surveillance or physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business or its operations. It also places equivalent expectations on its business partners.

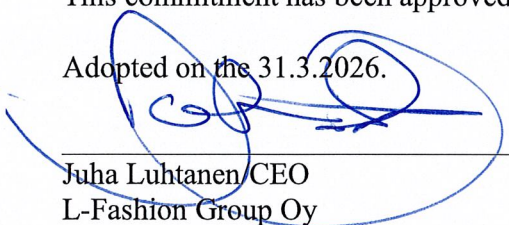
Luhta Group commits to engaging with human rights defenders as part of operational processes of risk assessment and due diligence or supporting the work of human rights defenders to create a safe and enabling environment for the work of civil society in locations where it operates, at both local and national levels.

Luhta Group's approach to Human Rights Due Diligence is based on the UN Guiding Principles on Business and Human Rights. The key pillars of this approach are:

- Effective and clear policy commitment that is approved by the most senior level of Luhta Group (this policy commitment)
- Continuous process for human rights risk assessment, which we have initiated with support from external human rights experts and which we will further develop to include meaningful stakeholder engagement and all geographies in which Luhta operates
- Integration of the adverse human rights impacts findings across functions and processes
- Commitment to remedy the adverse impacts on individuals, workers and/or communities Luhta has caused or contributed to, including commitment to collaborate with judicial and/or non-judicial mechanisms to provide access to remedy
- Expectation towards our business partners to commit to remedying the adverse impacts on individuals, workers and/or communities they have caused or contributed to
- Commitment to work together with business partners to remedy adverse impacts which are directly linked to Luhta Group's operations, products or services
- Tracking and monitoring the effectiveness of our actions through regular audits and dialogue with internal and external stakeholders; and
- Clear communication to internal and external stakeholders on how the human rights impacts have been addressed.

This commitment has been approved by Luhta Group's Board of Directors and CEO.

Adopted on the 31.3.2026.



Juha Luhtanen/CEO
L-Fashion Group Oy