



**fielmann  
group**

CORPORATE SOCIAL  
RESPONSIBILITY REPORT 2023

The Corporate Sustainability Report 2023 features Fielmann's sustainable eyewear.

The Corporate Social Responsibility Report of Fielmann Group AG and the Fielmann Group is published in both English and German. In case of doubt, the German version shall prevail.

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## Dear Shareholders, dear Friends of the Company,

as a family business with social values, corporate social responsibility (CSR) is close to our hearts. The Fielmann Group not only serves its customers and employees but also assumes responsibility for society and the environment. Underscoring this commitment, the Executive Leadership of the Fielmann Group set up a dedicated CSR team in 2023 with appropriate headcount and budget reporting directly to our CFO. This way we not only ensure compliance within an increasingly complex regulatory framework across multiple continents, but we make sure that progress is achieved on the issues that matter most to our customers and stakeholders.

While our Annual Report 2023 provides an overview of the financial success that we owe to our 28 million customers worldwide, this report transparently documents a wide range of non-financial indicators.

2023 saw us making great progress on our CSR agenda. While primary eye care services are a standard component of our industry's offering in the United States, in Continental Europe eyecare services are the domain of ophthalmologists. And yet, demographic change drives demand for eye care services across Central Europe while the number of ophthalmologists is decreasing. In Germany alone, thousands unnecessarily go blind every year. This number could be significantly reduced by means of regular eye health screenings conducted in collaboration between opticians and ophthalmologists. True to our purpose "We help *everyone* hear and see the beauty in the world", we began offering an innovative service in the reporting year: the Eye Health Service. Certified Fielmann opticians take images of the retina and measure the intraocular pressure with state-of-the-art equipment in Fielmann stores. Subsequently, the data is digitally transferred to ophthalmologists who conduct an assessment and provide customers with feedback within a few days. Customers with findings receive a recommendation to consult a local ophthalmologist or clinic for diagnostics and treatment. Together with our partners in ophthalmology we are proud to make eye health screenings easily and quickly accessible to ever more people across Europe. At the time of writing, more than 20,000 customers have already had their eye health checked in Fielmann stores. We expect to offer the service in more than 400 stores before the end of 2024 with the goal of serving more than 20,000 customers per month by year-end and more than 100,000 customers in total in 2024.

In the reporting year, we updated and expanded our existing Code of Conduct for all Fielmann Group employees to ensure we act responsibly and according to our values throughout our company. This update included regulatory changes in existing markets, for example the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz) in Germany, and also accounts for our business in new geographies such as North America. We published our Declaration of Principles on Human Rights, updated our Code of Conduct for Suppliers and set up a whistleblower portal available in multiple languages.



**Marc Fielmann**, Chief Executive Officer

The Fielmann Group is constantly expanding its selection of highly attractive sustainable products. In 2023, we significantly extended our successful sustainability collection. We are proud to have attained the ISCC PLUS certificate. We also welcomed the initiatives of many of our partners that allowed us to additionally extend the number of sustainable models in our fashion brand assortment. All in all, our customers can now select from Fielmann's largest-ever, continuously growing selection of sustainable products.

Even small changes can have a big impact in the long term. Our employees' ideas on how we can make our products and logistics more sustainable are essential for us. On their initiative, we introduced reusable containers and removable labels in 2023, as well as cardboard filling material instead of plastic for transporting our products. This way, we are continuously becoming more sustainable.

Since 1986 nature conservation and environmental protection has been an integral part of our company's DNA as evident from our Environmental Pledge published that year: Every year since then we have planted a tree for every employee. To date, the Fielmann Group has donated a total of more than 1.7 million trees and bushes, mainly to be found in public parks, in front of schools, kindergartens, state buildings and publicly accessible forests. We are also committed to education and research as well as the preservation of historical monuments and culture. Our focus lies on long-term partnerships with charitable, regional organisations. And we regularly donate glasses. After parts of Turkey and Syria were ravaged by devastating earthquakes in February 2023, we provided the aid organisation "Hanseatic Help" with 10,000 pairs of safety glasses free of charge. They protected the eyes of the emergency workers from falling rocks, wood splinters, liquids and dust during the clearance work.

While our focus remains on making significant contributions to operating in a more resource-efficient and sustainable way, there will be some changes in our CSR activities in 2024. The report you are currently reading is the last one in its current form: From this year onward, our CSR reporting will be integrated into our Annual Report in line with the European Union's new Corporate Sustainability Reporting Directive (CSRD). As part of this, we are carrying out an extensive CO<sub>2</sub> footprint analysis across the Fielmann Group as a basis for our goal of becoming CO<sub>2</sub>-neutral. Based on the CSRD, we are carrying out a climate risk assessment for our stores, manufacturing sites, logistics centres and head offices worldwide to identify the likelihood of future climate hazards and their potential impacts for our company.

It is up to us to take good care of our customers, our employees, the community and our environment. With this in mind, our sustainability report presents the outstanding work that our employees are accomplishing to make our family business even more responsible, resource-friendly and sustainable. Together, let us continue to help *everyone* hear and see the beauty in the world.

Hamburg, 18 April 2024



Marc Fielmann  
Chief Executive Officer

GRI 2-22



## Sustainable corporate governance

### About the Fielmann Group

The Fielmann Group AG is a stock-listed family business based in Hamburg, Germany. As the most customer-centric provider of eyewear, contact lenses and hearing aids, we serve our 28 million active customers through an omnichannel platform comprised of digital sales channels as well as more than 1,000 retail stores. Our vertically integrated business model allows us to provide our customers with the most attractive product selection, outstanding service and the best value for money. We thrive thanks to our more than 23,000 committed and highly skilled employees, who embody our customer-centric philosophy. With our Vision 2025, we take this philosophy into the future and shape the optical industry for the benefit of consumers – without compromising on quality.

### Business activities

The Fielmann Group AG, which has its Head Office at Weidestrasse 118 a, Hamburg, Germany, is the Group's listed parent company. We invest in and operate optical businesses and hearing aid companies. We furthermore manufacture and distribute visual aids and other optical products. These products include glasses, frames, lenses, sunglasses, protective glasses, contact lenses, related articles and accessories. We also sell merchandise of all kinds as well as hearing aids and their accessories. We keep expanding, are offering our customers even more personal service with new stores and are rolling out our omnichannel business model. As at 31 December 2023, we operated digital sales channels in most major markets as well as a total of 1,086 stores (previous year: 968). The number of stores also includes our acquisition in the USA, which was consolidated on 1 September 2023.

### Fielmann Group AG stores<sup>1</sup>

Country	2023		2022	
	Number of stores	Share of overall sales	Number of stores	Share of overall sales
Germany	619	68.3%	614	71.20%
Switzerland	44	11.0%	46	11.80%
Spain	123	8.9%	111	7.00%
Austria	44	4.6%	39	4.70%
USA	82	1.6%	-	-
Others	174	5.6%	158	5.30%
Total	1,086	100.00%	968	100.00%

GRI 2-1 GRI 2-6 GRI 2-7

<sup>1</sup> In the EU member states of Czech Republic, France, Italy, Luxembourg, the Netherlands, Poland, Slovenia and Eastern Europe, the Group operates 174 stores. These stores are represented in the "Others" segment. Due to the acquisition in the USA on 1 September 2023, 82 stores are included in the store figure, which are consolidated in turnover as of 2023. Further information is provided in the Annual Report.

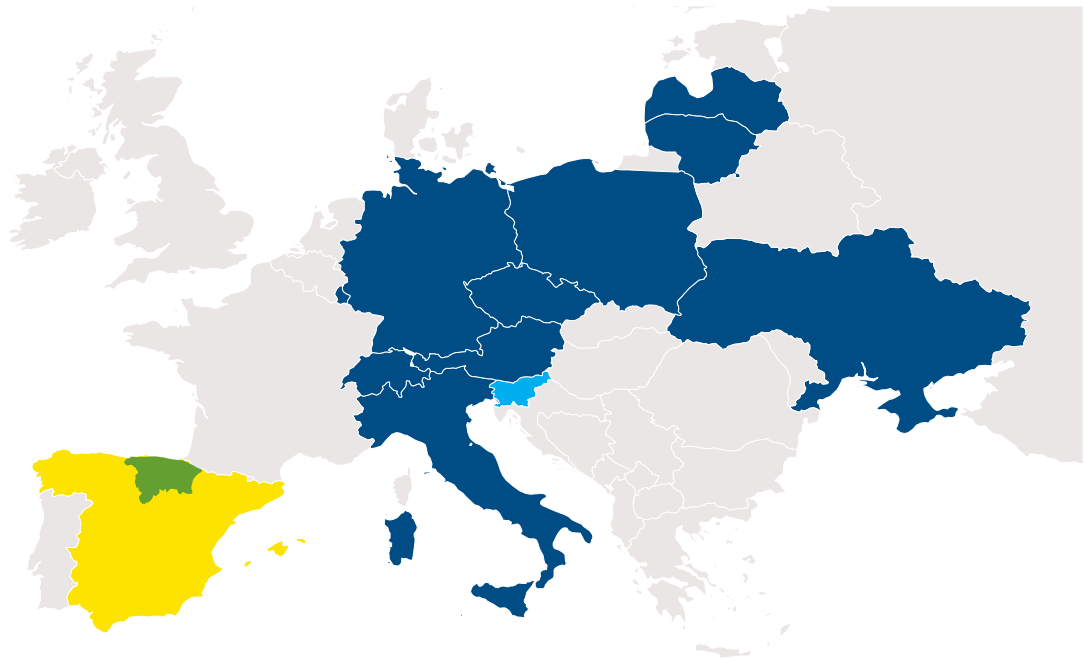


## Locations

### Europe

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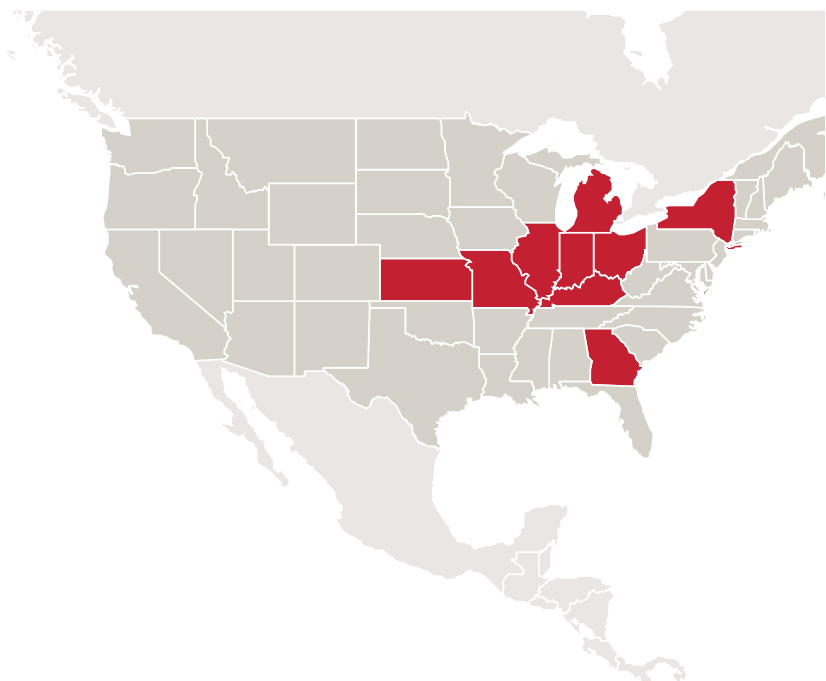
- Fielmann
- Optika Clarus
- Óptica & Audiología Universitaria
- Medical Óptica



### USA

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- SVS Vision



## The main products of Fielmann Group

Product	Description
Frames	In our stores, the Fielmann Group showcases the whole world of fashionable eyewear – our very own collections, international designers and brands.
Lenses	Our largest manufacturing site is located in Rathenow, Brandenburg. Under a single roof, we produce plastic and mineral-based lenses, fit them into the customers' individual frames and deliver them overnight to our stores. Customers also find lenses from other major brands and well-known manufacturers at guaranteed best prices in the stores of the Fielmann Group.
Sunglasses	Whether as a fashion accessory or with a customised prescription, the Fielmann Group provides a wide selection of sunglasses: own collections, other major brands and international designers.
Contact lenses	The Fielmann Group sells contact lenses from major brands and well-known manufacturers at guaranteed best prices.
Hearing aids	In more than 300 hearing aid studios, the Fielmann Group offers its customers all the major brands and popular hearing aids at guaranteed best prices.

GRI 2-6

In line with our purpose “We help everyone hear and see the beauty in the world”, almost all products of the Fielmann Group offer social benefits as they enable good vision and hearing, thereby allowing greater participation in society and considerably reducing risks at work or in traffic. The Fielmann Group provides free eyesight and hearing tests in stores in order to help people detect their individual needs. Customers are assisted by trained opticians and hearing aid professionals using precise measuring technology to find the best visual or hearing aid for them. Our website highlights the properties of the various models so that customers can arrange a free appointment with a product already in mind.

By creating fashionable eyewear at no cost (Nulltarif), Fielmann ended the discrimination against people wearing statutory health insurance glasses and made glasses socially acceptable. This is Guenther Fielmann's historical achievement. Even after the discontinuation of the statutory health insurance funds, our customers still receive glasses with no additional payments thanks to the zero-cost insurance from Fielmann and Hanse-Merkur. People who do not take out the zero-cost insurance can get a fashionable pair of glasses with top-quality single-vision lenses and a three-year warranty for as little as € 19. Our guidelines for responsible marketing oblige us to communicate the benefits of our products and services fairly and transparently.

The Fielmann Group regularly uses its expertise and resources to help people in need. We regularly collect and donate eyewear. After parts of Turkey and Syria were ravaged by devastating earthquakes in February 2023, we provided the aid organisation “Hanseatic Help” with 10,000 pairs of safety glasses free of charge. They protected the eyes of the emergency workers from falling rocks, wood splinters, liquids and dust during the clearance work.

Key figures of Fielmann Group		2023	2022
External sales	incl. VAT in € m	2,267.9	2,031.8
Consolidated sales	excl. VAT in € m	1,969.1	1,759.0
EBITDA	in € m	410.1	339.5
Equity capital	in € m	926.2	853.3
Debt	in € m	1,060.4	913.5
Number of stores	as at 31.12.	1,086	968
Employees	as at 31.12.	23,412	22,631

The following table shows the countries according to the segment reporting in the Annual Report:

### Sales

	2023			2022		
	Sales	Result before taxes	Employees	Sales	Result before taxes	Employees
	in € m	in € m		in € m	in € m	
Germany	1,343.8	162.7	17,066	1,253.0	138.9	17,143
Switzerland	217.3	43.5	1,376	208.2	34.4	1,430
Spain	175.4	10.0	1,658	123.3	10.4	1,518
Austria	90.8	10.1	836	82.8	6.1	816
USA	32.4	-10.2	835	-	-	-

GRI 2-6 GRI 2-7

### Memberships

German opticians are part of the Central Association of Opticians (ZVA), which, as the federal guild association, looks after the overall interests of the profession. The members are the regional guild associations or guilds. Fielmann is represented in all opticians' guilds. Fielmann is also involved in the German Federal Guild for Hearing Healthcare Professionals (biha).

In Switzerland, Fielmann is a member of the Swiss Federation of Opticians (AOVS), the Association of Swiss Advertisers (SWA), and the Swiss Association for Hearing Acoustics (HS). Fielmann is also active in the German-Swiss Chamber of Commerce. In Austria, Fielmann holds memberships of the Austrian trade association, the Austrian Economic Chambers (WKO), and the Guild of Healthcare Professions. In Italy, Fielmann is active in the retailers' trade and business association, and is a member of the service association. In Spain, we are a member of the national Association of Optical Chains (AECO) and in the Czech Republic, we are a member of the national Chamber of Commerce and Industry.

GRI 2-28

## Organisation and corporate governance

The Fielmann Group is a family business and thinks across generations. Fielmann Group AG is the Group's listed parent company.

### Supervisory Board

The Supervisory Board of Fielmann Group AG monitors the work of the Management Board and advises where necessary. Parity codetermination is regulated in the Codetermination Act (MitbestG) and represents a numerical balance in the composition of the Supervisory Board. Employees participate in the Supervisory Board's decision-making processes on equal terms with shareholder representatives. Fielmann Group AG's Supervisory Board currently consists of 16 members. Eight members are elected by the shareholders in accordance with the provisions of the German Stock Corporation Act (AktG), and a further eight members are elected by the employees in accordance with the Codetermination Act (MitbestG). The employee members of the Supervisory Board include two trade union representatives.

The Supervisory Board includes an HR Committee, a Mediation Committee, an Audit Committee and a Nomination Committee. There are no further committees. Prior to the annual meeting to review the year-end reports, all Supervisory Board members have the opportunity to obtain a detailed briefing on the content and results of the audit in a discussion forum attended by the Chief Financial Officer (CFO) and the chief auditor. The Supervisory Board is also given the chance to ask questions and make suggestions.

### Management Board

The Fielmann Group is a listed family business. Founded in 1972 by Guenther Fielmann and listed on the stock exchange since 1994, the company is now being led by the second generation: in a long-term succession process from 2016 to 2019, Guenther Fielmann gradually handed over responsibility to his son Marc Fielmann. Since November 2019, Marc Fielmann has been the sole Chief Executive Officer of Fielmann Group AG. The Management Board is responsible for the operational management of Fielmann Group AG. In the reporting year, the Management Board was composed of four and later of five people: The Supervisory Board appointed Steffen Baetjer as an additional member of the Management Board with effect from 15 August 2023. Since the departure of Alexander Zeiss from the Management Board at the beginning of 2024, the Board once again consists of four members. The company is represented by two members of the Management Board, or by one Management Board member and an authorised signatory. Regular Management Board meetings are held in order to make strategic decisions and to resolve interdepartmental issues.

### Corporate governance

At Fielmann Group, corporate governance embodies responsible corporate management geared towards long-term value creation. Transparent leadership strengthens the trust of customers, employees and investors in the work of the company and its committees.

We are committed to efficient cooperation between the Management Board and the Supervisory Board, respect the interests of our shareholders and cultivate transparent corporate dialogue.

The Management Board and Supervisory Board have pledged to ensure the continued viability of the company and sustainable value creation through responsible and long-term corporate governance.

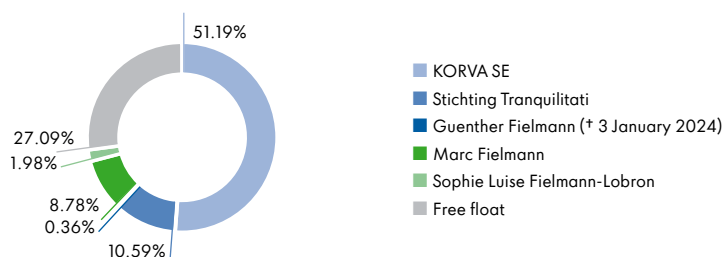
The work of the Management Board is governed by the statutory regulations, the Articles of Association and the rules of procedure. Fielmann lists the responsibilities of the individual board members at: [Fielmann – Management Board \(fielmann-group.com\)](https://www.fielmann-group.com).

### Ownership structure<sup>2</sup>

The Fielmann Group has the legal status of a German Aktiengesellschaft (AG). We regard ourselves as a family business. This is reflected in the personal commitment of the founding family for the well-being of customers, employees and the company.

The family's connection to the company is also reflected in the ownership structure of Fielmann Group AG: via the family's holding company KORVA SE, the Stichting Tranquilitati, the Fielmann Familienstiftung and direct equity, the Fielmann family controls 72.91% of the shares in Fielmann Group AG. The remaining 27.09% of shares are in free float. 51.19% of the shares owned by the Fielmann family in Fielmann Group AG are held by KORVA SE. With 92.50% of the votes, the Fielmann Familienstiftung indirectly has the decisive influence on KORVA SE and therefore the majority rights in Fielmann Group AG. These majority rights are permanently secured. The remaining 7.50% of the votes in KORVA SE are held directly by members of the Fielmann family. In 2023, the only Management Board member of KORVA SE and the Fielmann Familienstiftung was Marc Fielmann.

### Ownership structure of Fielmann Group AG



GRI 2-9

<sup>2</sup> See also corresponding sections in the accounts of Fielmann Group AG 2023

## Corporate social responsibility management and organisation

For the Fielmann Group, responsible and ethical behaviour is part of who we are. It represents a core component of our corporate philosophy. The Fielmann Group attaches great value to responsible interaction with employees and customers as well as to the protection of the environment and natural resources. The basic rules of conduct formulated for this purpose are available to all employees.

GRI 2-23

The Management Board and the respective management teams of the Group subsidiaries are responsible for ensuring the socially responsible behaviour of Fielmann Group AG. As part of their departmental duties, the various board members are responsible for the numerous activities described in detail in this report.

The activities of Fielmann Group AG in the fields of ecological and social commitment are coordinated by the Communications and Public Relations department. The finance department is responsible for fulfilling regulatory requirements in the area of sustainability. In 2023 we further developed our sustainability management and set up the CSR team within the finance department in order to meet our own requirements and those of our stakeholders. It plays a key role in sustainability management, documents the work of all Management Board departments and is in constant dialogue with the Chief Financial Officer and, if required, with the Management Board as a whole.

The Management Board ensures transparency through its managers, the risk management system (RMS) and the internal audit and takes measures where necessary. The overall responsibility for corporate social responsibility management and its further development remains with the Management Board.

With its non-financial declaration (CSR report), the Fielmann Group AG reports annually about corporate social responsibility in the company.

### Materiality analysis and material topics

The Fielmann Group added to its reporting on corporate social responsibility pursuant to Sections 289b and 315b of the HGB in the financial year 2017, and has since presented its wide range of activities following the principles of the Global Reporting Initiative (GRI).<sup>3</sup> In the financial year 2017, the Management Board of Fielmann Group AG carried out an extensive materiality analysis for the first time. This was accompanied by detailed preparations with internal and external stakeholders. The topics were identified in a systematic process following the GRI standard and in consideration of the definition of materiality pursuant to Sections 289c Para. 3 and 315c of the HGB. Subsequently, the topics were selected due to their materiality for the stakeholders as well as for the company and assessed in the two-dimensional materiality matrix with regard to their meaning. The Management Board regularly reviews, validates and prioritises the defined topics.

We are continuously developing and optimising our CSR objectives. The assessment of material topics was carried out according to the following aspects:

<sup>3</sup> In the last report, the numbering of the GRI indicators was updated to the new GRI Standards 2021. The report's content was, however, not expanded based on the previous GRI Standards. In view of the upcoming changes due to the Corporate Sustainability Reporting Directive, the current report's content will be retained for the time being and use the GRI Standards as a guideline.

- Company environment: opportunities and risks in the political, legal, economic, eco-logical, technological and social environment
- Internal company analysis: strengths and weaknesses of the competencies and re-sources, the business model, the product portfolio and the value chain
- Stakeholder expectations: deductions and assumptions regarding the expectations of customers, suppliers, business partners, employees, consumers, environmental organisations, industry associations, shareholders and the media

The topics deemed to be of material importance were also assessed with regard to their double materiality pursuant to Sections 289c and 315c of the HGB – thereby following the principles of the GRI standards.

GRI 3-1

### Material topics

Corporate governance	Customers	Employees	Society	Environment
Governance and compliance	Customer data protection Customer health and safety	Attractive employer Employee health and hygiene	Social responsibility Social standards in the supply chain	Energy and emissions

GRI 3-2

### Risk management and significant risks pursuant to Sections 289c and 315c of the HGB

Fielmann Group AG has set up a comprehensive risk management system that enables the company to identify and make use of opportunities at an early stage without ignoring potential risks. All key planning and control elements are incorporated into a detailed reporting system. Using defined thresholds, Fielmann Group AG regularly assesses whether and which concentrations of risk exist within the Group. This systematic monitoring is integrated in all relevant processes. As part of monthly and yearly reporting, we identify potential risks and evaluate them with regard to their significance for the economic position of the Fielmann Group.

Since the financial year 2018, our evaluation has also included material risks as per Sections 289c and 315c of the HGB, insofar as they have or could have serious negative consequences on environmental, employee and social matters as well as on attempts to respect human rights and combat corruption. This concerns the material risks related to own business activities of the Fielmann Group (Section 289c Para. 3 (3) of the HGB) as well as the material risks linked to our business relations, products and services (Section 289c Para. 3 (4) of the HGB).

The risk management system takes into account the likelihood of risks arising and their potential impact as well as the basic measures for addressing the identified risks. We evaluate the risk indicators using data sheets. We use a traffic light system to document the severity of risk for our topics. To do so, we use the following risk categories:

- Green: minimal risk (expected damage less than € 6.0 million)
- Green-yellow: medium risk (expected damage from € 6.0 million to € 12.0 million)
- Yellow: high risk (expected damage from € 12.0 million to € 18.0 million)
- Yellow-red: critical risk (expected damage from € 18.0 million to € 24.0 million)
- Red: highly critical risk (expected damage of more than € 24.0 million)

The risk identification, evaluation and assessment are carried out decentrally by the individual departments of Fielmann Group AG. The Controlling department coordinates and is responsible for the process and forwards the risk reports from the individual departments to the Management Board. The effectiveness of the information system is regularly assessed by internal audits and an external audit.

GRI 2-23

Fielmann Group AG has examined all material topics presented in this report for significant risks pursuant to Sections 289c and 315c of the HGB. No significant risks were identified from business activities, business relationships or products and services which are likely to have serious negative effects on the aspects stated in Sections 289c and 315c of the HGB. The risks are thus classified at a low level (green). For further information on our risk management system as well as on the financial risks and opportunities, please refer to our Group Management Report.

### Stakeholder dialogue

The Fielmann Group has identified the key stakeholders as part of a systematic process. They are consulted at regular intervals or whenever required. We pick up on their suggestions and ideas, and give an account of them in this report. The main stakeholders of the Fielmann Group include customers, employees and managers, the Supervisory Board, shareholders and investors, banks, the works council, suppliers, associations, public authorities and the media as well as foundations and NGOs.

External stakeholders can send their questions and suggestions on social responsibility matters via email at [nachhaltigkeit@fielmann.com](mailto:nachhaltigkeit@fielmann.com). Incoming emails are screened by the CSR team and answered in collaboration with the respective divisions.

Stakeholder	Interaction
Customers	Regular satisfaction survey Transparent and continuous dialogue process supported by digital communication tools and events
Employees and managers	Regular strategy and work meetings Transparent and continuous dialogue process through regular reporting
Supervisory Board	Four board meetings per year, individual voting and committee meetings Transparent and continuous dialogue process through regular reporting as well as ad-hoc publications
Shareholders and investors	Regular investor relations meetings
Banks	Transparent and continuous dialogue process Transparent and continuous dialogue process
Works council	Regular coordination between the works council, the labour director and the members of the Management Board



Stakeholder	Interaction
Suppliers	On demand
Associations	On demand
Public authorities	On demand
Media	Press releases, regular events, continuous dialogue
	Dialogue for recurrent collaborations
Foundations and NGOs	On demand

GRI 2-29

### Objectives, measures, results and performance indicators

Pursuant to Section 289c Para. 3 of the HGB, Fielmann Group AG has developed the objectives, concepts and measures (Section 289c Para. 3 (1) of the HGB) and documented the results (Section 289c Para. 3 (2) of the HGB) of every material topic. This presentation is supplemented by relevant non-financial performance indicators (Section 289c Para. 3 (5) of the HGB). The topics are described in the following chapters:

- Sustainable corporate governance:
  - Governance and compliance
    - Economic performance (GRI 201)
    - Anti-corruption (GRI 205)
- Responsibility for our customers:
  - Customer health and safety (GRI 416)
  - Customer data protection
    - Customer privacy (GRI 418)
- Responsibility for our employees:
  - Attractive employer
    - Employment (GRI 401)
    - Training and education (GRI 404)
  - Employee health and hygiene
    - Occupational health and safety (GRI 403)
- Responsibility for our society:
  - Social responsibility
    - Indirect economic impacts (GRI 203)
  - Social standards in the supply chain
    - Supplier social assessment (GRI 414)
- Responsibility for our environment:
  - Energy and emissions
    - Energy (GRI 302)
    - Emissions (GRI 305)

The material topics listed above fully cover the five required aspects (environmental, employee and social matters as well as respect for human rights and anti-corruption) of Sections 289c Para. 2 and 315c of the HGB (see “About this report”, pp. 67-68). They are presented in detail below.

## Governance and compliance

### Business environment and requirements

As at 31 December 2023, the Fielmann Group operates 1,086 stores across Europe and the USA. Statutory regulations are varied and complex.

### Objectives

**Operations assessed for risks related to corruption.** The Fielmann Group assesses all business locations for corruption risks. The corresponding assessments are carried out at irregular intervals. We target any evidence of corruption for further investigation.

**Financial assistance received from the government.** The Fielmann Group claims not to receive any financial support from governments for operating its businesses.

### Concepts, management and measures

The Fielmann Group operates a comprehensive compliance system to achieve law-abiding and ethical behaviour among its employees and business partners. The system includes a group-wide Code of Conduct, a Code of Conduct for suppliers, a Declaration of Principles on Human Rights, as well as supplementary guidelines, individual specifications for risk areas and a risk management system. The Group takes both local and international laws into account. Our company and our success are characterised by the mutual trust and shared responsibility of all our employees, by the protection of the environment and natural resources, and by our behaviour in business life. Misconduct and violations of the law can cause enormous reputational damage and lead to major economic losses. The Management Board is responsible for the continuous development of the compliance system. Amendments are communicated to all employees in good time. In the event of any compliance issues, employees are instructed to contact their team leader, the Group's Internal Audit or the Management Board directly. Employees also have the opportunity to report breaches of compliance requirements via a whistleblower portal. It is available to all employees and third parties in various languages at [fielmanngroup.integrityline.com](https://fielmanngroup.integrityline.com) and allows violations to be reported anonymously. The Internal Audit ensures the company-wide implementation and application of the valid guidelines by means of regular audits.

The Management Board of Fielmann Group AG has enhanced the Code of Conduct for the Group in 2023 to provide employees with a clear framework. Employees can access this guideline at any time. It is about guaranteeing human and labour rights, prohibiting corruption and bribery, regulating invitations and gifts, ensuring health and occupational safety, environmental protection and energy efficiency and the legal obligation to prevent money laundering. The Management Board identifies and regularly checks the main risk areas and updates the Code of Conduct accordingly. The employees will be immediately informed of any amendments or updates.

Besides maintaining law and order, ethical principles must also be taken into account at the Fielmann Group. Every employee pledges to comply with the Group's customer-oriented rules. Managers also pledge to comply with the company-wide leadership guidelines. In turn, the Group pledges to respect its customers, employees and society and to contribute to this end in many ways. This commitment is highly important to us. The Group's ordinary business activities include optical retail and hearing acoustics, mainly within the European Union.

Bearing this in mind, Fielmann Group AG assesses the risk of corruption (Section 289c Para. 3 (3) of HGB) in the company and its environment as low. Fielmann Group AG is also currently not aware of any significant risks regarding business relationships or products and services (Section 289c Para. 3 (4) of HGB).

We have published the Code of Conduct for the Fielmann Group, the Code of Conduct for Suppliers, a Fielmann Group Declaration of Principles on Human Rights and the link to our whistleblower portal on our corporate website: [Fielmann – Declaration on Corporate Governance \(fielmann-group.com\)](#).

GRI 2-23 GRI 3-3

### Results in the reporting year

**Operations assessed for risks related to corruption.** In 2023, we inspected 139 stores for corruption risks (previous year: 177).

Assessments	2023	2022
Number of stores	1,086	968
Assessed stores	139	177
Share of inspected stores (in %)	13	18

GRI 205-1

**Financial assistance received from the government.** Fielmann Group AG is not aware of the participation of a government as a shareholder. The Fielmann Group receives individual, publicly regulated funding programmes for further training and professional development. In the financial year, the wage cost and social security reimbursements of € 0.2 million received from benefits like the reduced hours pay scheme and comparable measures abroad were offset against personnel expenses (previous year: € 2.7 million).

GRI 201-4

## Our contribution to the UN Sustainable Development Goals (SDGs)

As an international company, our scope is global. As a family business we have values beyond profit maximisation and a time horizon that emphasises the long term. Consequently, we actively contribute to several UN Sustainable Development Goals (SDGs). They call for a fairer and more sustainable world, and range from strengthening sustainable production through to measures for climate protection. Of the 17 SDGs, six topics are of particular relevance to the Fielmann Group.



### Good health and well-being

As opticians and hearing care professionals, we provide healthcare services. Almost all the products sold by the Fielmann Group, including lenses, frames, contact lenses and hearing aids, are medical products that have to meet strict requirements. Our own production quality control systems coupled with in-house production facilities, ensure that our customers can rely on the highest standards in quality and expertise.

Considering products sourced from third parties, we only distribute products from manufacturers that meet our strict quality standards. We regularly monitor this via appropriate certifications. Our aim is to ensure safe working conditions and health protection in our supply chain as well.

Although demographic change has led to ever increasing demand for eye care services for years now, the number of ophthalmologists in private practice in Central Europe continues to decline. We launched an innovative service in 2023 to cater to customer needs: the eye-health service. Certified opticians take images of the retina and measure the intraocular pressure with state-of-the-art equipment in Fielmann stores. Subsequently, the data is digitally transferred to ophthalmologists who conduct an assessment and provide customers with feedback within a few days. Customers with findings receive a recommendation to consult local ophthalmologists or clinics for diagnostics and treatment.

As an employer, it is important to us to offer our employees a healthy and safe working environment in which they feel comfortable.

### Quality education

The Fielmann Group is the industry's largest provider of apprenticeships and training in Central Europe. We offer young talents clear objectives and compelling values. Our more than 4,000 apprentices annually are the best in the industry – as testified by nationwide awards. In the German optical industry competition, Fielmann has accounted for an average of 71% of the regional winners and 88% of the national winners over the last ten years. We train thousands of employees every year, and invest double-digit million amounts in training and development courses annually. Where possible, we fill management positions from within our own ranks.



### Decent work and economic growth

Our more than 23,000 employees, who embrace our customer-friendly philosophy, are the foundation of our success. As a family-run company, we offer them a secure, satisfying and motivating working environment. We use specific funding programmes to assist our employees in all phases of their careers and offer them individual career plans. We promote diversity and equality and give our employees the opportunity to acquire shares in the company.

In 2023 we enhanced our Code of Conduct for the Group. Among other things, it includes the prohibition of corruption and bribery, the regulation of invitations and gifts as well as compliance with health and safety at work. We have also drawn up a Declaration of Principles on Human Rights and updated the existing Code of Conduct for our suppliers, since we expect our suppliers and service providers to comply with the social standards that our customers expect from us.

### Reduced inequalities

The democratisation of eyewear is the historic achievement of our founder, Guenther Fielmann. Thanks to the Fielmann Group, everyone in our markets can afford fashionable eyewear. By expanding our distribution network and making excellent health care affordable, we live up to our purpose "We help everyone hear and see the beauty in the world". Thanks to our online shops, customers in Germany, Austria and Switzerland can also buy prescription glasses if they are unable to visit our stores. Besides selling glasses, donating to those in need has always been part of our corporate identity. Thus, we actively contribute to reducing inequalities.

### Responsible consumption and production

Sustainable behaviour is a core component of our corporate philosophy. We regard it as our corporate duty to adhere to sustainable principles and continuously develop them – in our stores, our offices and our production facilities. In 2022 we launched our sustainable frame collection made of recycled acetate followed by another sustainable frame collection made of bio-based acetate. Sustainability is also important to us in the supply chain: we only sell products from suppliers if they undertake to comply with our strict quality standards regarding environmental protection and sustainability, as defined in our Code of Conduct.

### Climate action

The Fielmann Group has been contributing to natural preservation and climate protection since proclaiming its Environmental Pledge in 1986. Being a healthcare service provider and retailer at its core, the company's CO<sub>2</sub> footprint is significantly smaller than that of other companies of the same size, especially in energy-intensive manufacturing. Nonetheless, being a responsible family business, we not only plant trees but are also committed to contributing our part by systematically reducing CO<sub>2</sub> emissions. To provide the groundwork, we are participating in the rating process of the non-profit organisation CDP (formerly known as the Carbon Disclosure Project). Based on this internationally recognised reporting standard, we disclose our environmental impact, and report on measures and results in order to further reduce our CO<sub>2</sub> emissions. We aim to reduce harmful CO<sub>2</sub> emissions caused by our business activities and reach net zero latest by 2040.





## Responsibility for our customers

### **You are the customer**

At the core of our success is our customer-centric philosophy: “You are the customer”. We offer customers the best possible solution, irrespective of their budget. This is because we think long-term: customer satisfaction and retention are more important to us than short-term profit. Through innovation, we continuously change the market in the interest of our customers: The Fielmann Group has time and time again introduced services that did not exist before.

We work to keep information security and data protection in line with the progress of technical innovation. We view digital innovation and customer-oriented data protection as a symbiosis, not a contradiction. Fielmann Group AG has formulated internal data protection standards in order to fulfil the relevant legal requirements, particularly the EU General Data Protection Regulation (GDPR). Our objective is to process data transparently, honestly and securely at all times. We treat all personal data confidentially. This includes all information that can be related to an identifiable person. This data is subject to legal protection, regardless of whether it is in digital or paper form. Through clear responsibilities, our data protection management system as well as technical and organisational measures, we ensure that the data entrusted to us is processed in a customer-oriented and legally compliant manner.

The quality of our products has always been of particular importance to us. Our quality controls are significantly more demanding than the legal requirements. This applies both to lenses and frames. We participate in the development of globally valid quality test methods and support the further development of ISO standards.

### **Customer data protection**

We protect the personal data of our customers and guarantee that all personal data is treated confidentially and conscientiously at all times.

### **Business environment and requirements**

All customer data is processed in line with the GDPR, the German Federal Data Protection Act and other applicable data protection regulations. It may only be used for the purposes for which it has been expressly entrusted to us and for which there is a legal basis. We comply with any requests for information, deletion, or updates without delay, in compliance with the statutory retention periods.

GRI 3-3

### **Objectives**

The Fielmann Group combines innovative services with customer-oriented data protection and regards customers as responsible citizens. They are always entitled to know how and for what purposes their data is being processed. We only collect, process and use personal data in the course of our business activities in all Group companies if we have the required legal basis. We respond immediately to any enquiries or complaints regarding data protection. Priority is given to the protection of our customers’ personal data.

Fielmann also processes the personal data of its employees, business partners and shareholders confidentially and in accordance with the data protection directives. Our objective is to continuously develop our organisation, processes and systems to ensure that personal data is always processed and stored in accordance with the law. We work closely with the regulatory authorities and document our data protection management system properly to ensure that the system is in compliance with statutory requirements. We implement the necessary amendments and improvements in good time.

**Percentage of answered enquiries within 30 days.** We aim to deal with any requests for information, deletion or updates within 30 days, in compliance with the statutory retention periods (target level: 100%). In this respect, we adhere to the processing time of one month as stipulated by the GDPR.

**Training level of project managers.** Data protection is not just a technical issue. Through regular training by the legal department, we ensure that all project managers are informed about legal requirements and additional data protection standards of the Fielmann Group. In addition, we provide an e-learning course "Basics of data protection" as well as information on our reporting procedure for dealing with any data protection breaches. The project managers are also familiar with our technical and organisational measures and are required to comply with them (target level: 100%).

GRI 3-3

### Concepts, management and measures

Data protection has always been of great importance to us. Customers of the Fielmann Group can rest assured that their personal data is processed securely, in their interest and in accordance with the law. We back up this promise with strict data protection standards, a data protection management system, and far-reaching technical and organisational measures.

**Data protection and privacy standards at Fielmann Group AG.** Fielmann Group AG has formulated standards in its directive on data protection and privacy in order to fully comply with the statutory requirements, in particular the GDPR. This internal directive sets out the data protection and privacy principles and their implementation at Fielmann Group AG and its national and international subsidiaries. It documents and specifies which requirements must be observed and implemented when processing personal data. Fielmann Group AG is committed to the following data protection and privacy principles:

- Legality and fairness of data processing
- Purpose of data processing
- Transparency in data processing
- Data avoidance and minimisation
- Data protection by design and default
- Data deletion and storage limit
- Factual accuracy and up-to-date data
- Confidentiality and data security
- Maintaining the rights of the persons concerned



**The Fielmann Group data protection management system.** We ensure the implementation of the data protection and privacy standards through a central data protection management system. It embeds the data protection directive in all parts of the company. Within the framework of the data protection management system, the Data Protection Officers, the Legal department, the Governance department and a law firm specialised in data protection and privacy laws work closely together.

As far as required by applicable national laws, the companies in the Fielmann Group have appointed a Data Protection Officer. The respective Data Protection Officer is responsible for information, cooperation and monitoring tasks, as set out in Article 39 of the GDPR. Our Data Protection Officers are equipped with sufficient staffing and financial resources. The company Data Protection Officers are consulted before guidelines, training documents or key decisions on data protection and privacy are approved. They check and assist all relevant projects and work towards ensuring the lawful management of personal data. The Management Board consults the Legal department on decisions relating to data protection and privacy. Their task is to regularly review and develop data protection and privacy standards at the Fielmann Group with regard to statutory stipulations and – together with Governance – technological change. Our in-house legal experts work together with an international law firm specialising in data protection and privacy. Besides IT architecture, the Governance department carefully monitors information security and other selected data protection issues. This department develops the technical and organisational measures on data security, assists all projects relevant to data protection and provides concrete support when it comes to implementing internal guidelines and legally governed regulations. Fielmann Group AG has had an expanded data protection team in Governance since 2018, which is responsible for supporting the departments and further developing the data protection standards. A separate customer service team specialises in answering enquiries related to “data subject rights”. The above-mentioned departments are responsible to the Management Board for documenting, evaluating and securing sensitive data. In this function, the Governance department continuously developed the data protection management system in the 2023 reporting year.

**Technical and organisational measures for data security.** The Governance department receives instructions from the Management Board, the Data Protection Officers and the Legal department and translates them into technical and organisational measures that, in turn, are received by the employees responsible for processing personal data.

We determine the technical and organisational measures in consideration of the given risks, the present state of technology, the implementation costs, and the type and extent of circumstances and purposes of the data processing, pursuant to Articles 25 and 32 of the GDPR. In order to guarantee a level of protection appropriate to the risks, these measures include the following:

- The pseudonymisation and encryption of personal data
- The ability to permanently ensure the confidentiality, integrity, availability and capacity of the systems in relation to the data processing
- The ability to quickly re-establish the availability of personal data in the event of a physical or technical incident
- A procedure for regularly testing, assessing and evaluating the effectiveness of the technical and organisational measures that ensure that the data is processed securely

**Standard processes for data subject rights.** Customers and partners can exercise their rights to enquiry as per Articles 15 to 22 GDPR at any time and free of charge via phone (where permitted), email or post. We document, check and process any data protection enquiries sent to us by those affected (“data subjects”) or regulatory authorities. A separate customer service team handles enquiries from data subjects as a rule. Data Protection Officers and the Legal department support customer service if necessary.

Solely Data Protection Officers or the Legal department will communicate with the regulatory authorities. Since May 2018, we have pointed this out to all our customers via information brochures as well as in the privacy notes of our online services. If customers are interested in the new digital services of the Fielmann Group, they are comprehensively informed about which data is collected by the company and for what purpose. For these digital services, customer consent must be attained in digital or written form if there is no other appropriate legal basis. The right to object is possible at any time.

**Training courses and professional development.** Data protection is not just a technical issue. All employees must understand the statutory requirements and additional internal stipulations. Information on the technical and organisational measures is also available to employees. Only if data protection is fully embedded in the daily work of employees will it be possible to continuously raise the data protection level. In addition, Fielmann Group AG regularly trains all project managers and has taken the following measures:

- Commitment of all employees to data protection (upon recruitment)
- Distribution of the directive on data protection and privacy
- Regular training on data protection
- Distribution of a flyer to employees containing basic information on data protection
- Distribution of a flyer to customers about data protection

Data protection and privacy is deeply embedded at the Fielmann Group from an organisational, technical and management perspective. The proper processing of personal data is governed by strict data protection standards that are continuously reviewed and developed. The data protection management system works towards the continuous improvement of data protection through clear responsibilities, technical and organisational measures and regular training.

GRI 3-3

### Results in the reporting year

In the reporting period, no relevant breaches of customer privacy or loss of customer data were identified that could be expected to result in an actual risk to the rights and freedoms of the persons concerned. This also applies to unauthorised access to data and further violations of statutory stipulations or the internal data protection directive within Fielmann Group AG. We maintained constructive dialogue with the data protection authority in Hamburg and others throughout the reporting year.

In the reporting year 2023, we significantly developed our data protection management system and the Information Security Management System (ISMS). The ISMS is regularly reviewed in an external audit in the context of activities as an insurance agent for the Zero-Cost Insurance policy.

The Data Protection Officers will continue to attend to their legally governed supervisory duties and provide advice. The Legal department continues to develop the data protection directive, advises departments and business units on projects, updates contracts and develops data protection management. The Governance department improves the data protection/security system at national and international level. This includes the continuous development of guidelines and concepts, such as the reporting concept for data protection infringements and employee guidelines for avoiding data protection infringements.

**Percentage of answered enquiries within 30 days.** In the 2023 financial year, we received a total of 20,734 enquiries related to data protection, corresponding to 0.07% of the total number of customers. About 13,000 (0.05%) were objections to advertising, the rest (0.02%) were rectification requests or related to information, deletion and anonymisation, among others. All processes were completed in 2023. We answered the enquiries within five days in 84.3% of the cases. For a further 11.3% of the enquiries, we needed up to ten days for the final response. We were able to resolve another 3.6% within 20 days and 0.4% within 21 to 30 days, achieving an overall target of 99.7%.

**Training level of project managers.** In 2023, all project managers were informed about legal requirements and the data protection standards at Fielmann Group (achieved level: 100%). Training the project managers in how to deal with technical and organisational measures remains an ongoing process.

GRI 418-1

## Customer health and safety

Fielmann is the market leader in terms of price and quality. For us, quality also means ensuring our customers' health and safety. Our products undergo extensive testing before they are available to customers. Our quality management not only monitors legal compliance but also covers our guarantees for the quality of our products. As an example, we offer a three-year warranty on all glasses. Our customers buy without risk as we take every complaint seriously. If customers are not satisfied with their choice of glasses, Fielmann will exchange the pair or reimburse the full purchase price.

## Business environment and requirements

Almost all products sold by Fielmann, including lenses, frames, over-the-counter reading glasses, contact lenses, contact lens cleaning products and hearing aid systems, are medical devices. They are subject to the European Medical Device Regulation (MDR) and national laws in the respective markets, for example the Medical Device Law Implementation Act (MPDG) in Germany. Despite being in force since 2021, the MDR still presents quite a challenge for a lot of manufacturers. As old certificates will expire, the decrease in the number of notified bodies places pressure on the whole industry. Fielmann is in close contact with suppliers to monitor the expiry and renewal of the affected product certificates. As Fielmann also operates outside EU jurisdiction, for example in Switzerland, additional, national regulations must be considered.

The CE mark attests to the marketability of medical devices within the European Economic Area.

Besides prescription glasses, which are regulated by the MDR, Fielmann sells non-prescription sunglasses as well as protective glasses, which fall under Regulation (EU) 2016/425 on personal protective equipment. As such, health and occupational safety is now guaranteed by a clear and uniform EU law without it having to be implemented into the laws of all individual EU member states.

At our stores, only trained personnel carry out the fitting and dispensing of prescription glasses as well as eyesight tests. Payments by statutory health insurance providers are preceded by a prequalification process. It is checked whether the requirements for sufficient, appropriate and fit-for-purpose manufacture, sale and fitting of medical aids are fulfilled. The process includes a test regarding specialist qualifications, general and organisational requirements as well as spatial and practical requirements. If all requirements are met, the business premises will receive a corresponding certificate and are then entitled to arrange payments with statutory health insurance providers. These provisions and measures are essential for the protection of customer health. Incorrectly fitted lenses can lead to prismatic side effects, which can cause fatigue, nausea or headaches. Fielmann maintains and improves the quality of the products along the entire value chain. We are shaping the optical industry in Europe and the USA for the benefit of consumers – without compromising on quality.

GRI 3-3

### Objectives

We regard our quality management as a significant competitive advantage. For us, it is not enough to simply meet the statutory requirements governing product quality. Instead, we commit ourselves to stricter quality standards that we continuously develop and test at our laboratory in Rathenow.

**Percentage of assessed suppliers.** As a distributor, we aim to sell only frames, lenses, sunglasses, protective glasses, contact lenses and hearing aids from listed suppliers who assure us of the quality of their products within the framework of CE declarations of conformity (target level: 100%).

**Percentage of assessed frames in the Fielmann Collection.** As a distributor, we aim to ensure that all the frames in Fielmann's own collection successfully pass the quality tests in Rathenow (target level: 100%).

GRI 3-3

### Concepts, management and measures

Even before the introduction of the three-year warranty in 1977, we undertook a wide range of measures to ensure the quality of our products. For example, Fielmann's own laboratory was set up several decades ago in Rathenow. Here, the quality of our products is thoroughly tested before they are included in the collection. When selecting and using materials for spectacles and lenses, Fielmann complies with the regulations that apply to medical products.

Our Quality Management department is responsible for all quality assurance measures in the company. This unit is deeply incorporated in Fielmann's entire value chain. To support quality management, experts from the Regulatory Affairs team assist the specialist departments in fulfilling our products' regulatory requirements for the respective markets subject to the Medical Devices Regulation or the Personal Protective Equipment Regulation. Besides the organisational and process-related integration of quality management, we undertake the following measures in order to guarantee the quality of our products:

- Process control through our own production facilities
- Centralised quality control in Rathenow
- Automated control systems
- Continuous further development of the test criteria

**Process control through our own facilities.** By manufacturing many of the optical products we sell, we are able to control the complete value chain, from checking the raw materials to mounting the glasses. A quality management system set up according to ISO 9001 ensures a standardised organisation with highly automated manufacturing and testing processes at a consistently high level of quality.

In the production of lenses, quality assurance is also an integral part of the production process: before a lens leaves the production line, it is tested up to ten times. Every single lens is tested for surface and material defects as well as optical and geometric parameters. In the unlikely event of disruptions or longer production downtimes, we have implemented a comprehensive risk management system with corresponding precautionary measures and are insured against non-excludable losses.

**Quality control in Rathenow.** We supply more than 8 million frames every year. All eye-wear models in the Fielmann Collection have been successfully tested to EN ISO 12870 standards in our laboratories in Rathenow. This ensures that they are rust-proof, non-fade and release much less nickel than is stipulated by the German Commodities Ordinance. This applies to all price ranges without exception.

We simulate a three-year period of wearing glasses as part of our rigorous tests. The frames have to meet the highest operational requirements, as do the hinges. Sprayed with a special solution, we test the reactions to sweat, make-up and weather conditions, and check the colour fastness and stability of the coating. Only after passing the test do the frames receive a three-year warranty and become part of the Fielmann collection.

Sunglasses are subject to the same process but must also meet the strict requirements for the lenses' UV protection. We sell a wide range of sunglasses with "UV-400" protection, which exceeds the standards required by the EU.

We participate in the development of internationally recognised ISO standards for frames and lenses. We also devise internal guidelines and stipulations. For many test methods, such as the nickel resistance of metal frames, Fielmann tests more frequently than required by the standard. We regularly review and develop our testing procedures.

We only sell branded products if they meet our strict quality standards. We work exclusively with brand manufacturers who assure us of the quality of their products by means of the CE declarations of conformity and certifications. We also regularly check selected samples of product deliveries in order to guarantee a consistently high level of product quality.

**Automated control systems.** In the event of returns, experienced opticians check the returned items and document their findings on durability, material defects or similar deficiencies. If complaints about specific products are frequent, the Quality Management department takes corrective measures at short notice. Customer queries and test results that may fall under a reporting obligation to the legislator are documented, assessed and, if required, reported by Quality Management. Our IT-based check of incoming goods reduces potential risks and ensures our quality standards over the long term. Sample sizes, test results and product features that require improvements are documented in a system and quickly communicated to the production department. We inform suppliers about the results of the current checks and about possible changes to the product quality throughout the entire procurement period. If quality fluctuations occur, we are able to react within a short time.

**MDR compliance.** Regulation (EU) 2017/745 on medical devices has changed the demands on manufacturers and traders of medical devices.

As part of the MDR, a Unique Device Identification (UDI) for medical devices became mandatory within the European Union. The aim of the UDI system is to make it easier to track medical devices in order to be able to swiftly and reliably address possible incidents. As legally required by the MDR, Fielmann has been issuing UDIs for its medical devices since May 2021.

As part of the UDI system, all medical devices must be registered in the European medical device database (EUDAMED). In order to prevent a disproportionate number of data entries for highly individualised products, such as prescription eyewear, the European Union is planning to introduce a "Master UDI". Master UDIs allow for the bundled registration of medical devices within EUDAMED. Fielmann is participating in the international working group commissioned by the EU to develop the standard for this Master UDI.

GRI 3-3

### Results in the reporting year

With our own production facilities, centralised quality controls in Rathenow and automated control systems, Fielmann has taken comprehensive measures to comply with statutory regulations. What's more, our own quality requirements are much stricter than required by law.

In the financial year 2023, there was no incident that we would need to have reported to the relevant authorities in line with the medical devices law.

**Percentage of assessed suppliers.** In the reporting year 2023, we sold frames, lenses, sunglasses, protective glasses, contact lenses and hearing aids exclusively from listed suppliers (achieved level: 100%; previous year: 100%).

**Percentage of assessed frames in the Fielmann collection.** In 2023, all frames in the Fielmann collection successfully passed the strict quality tests in Rathenow (achieved level: 100%; previous year: 100%). This corresponds to a total of 13,252 laboratory tests (previous year: 8,736).

GRI 416-1





## Responsibility for our employees

### Basis of our success

Our employees are the cornerstone of our success. In line with our corporate philosophy of “You are the customer”, they offer our customers the kind of advice that they would like to receive themselves: in a fair, friendly, competent manner and, above all, irrespective of the price. We offer young people clear objectives and compelling values. For this reason, we invest double-digit million amounts in training and development courses every year. We assist our employees in all phases of their careers and offer them individual career plans. We transfer the safety, high quality and expertise that we offer our customers as the market leader in Germany to other countries. As the most customer-centric provider of eyewear and hearing aids, we serve our 28 million active customers through an omni-channel platform comprised of digital sales channels and more than 1,000 retail stores across Europe and the USA. As at 31 December 2023, Fielmann Group employed a total of 23,412 employees (previous year: 22,631).

<b>Staff as at balance sheet date</b>	<b>2023</b>	<b>2022</b>
Employees (excluding trainees)	19,354	18,524
Thereof employees in Germany	13,387	13,415
Thereof employees in Switzerland	1,189	1,245
Thereof employees in Spain	1,658	1,518
Thereof employees in Austria	654	632
Thereof employees in the USA	653	-
Trainees	4,058	4,107
<b>Total employees (including trainees)</b>	<b>23,412</b>	<b>22,631</b>

In Germany, Austria, Switzerland, Spain and the USA, we employed 21,589 people (92.2%) as at the reporting date. Another 1,823 employees work for the Fielmann Group in other countries.

<b>Overview of employment contracts (Germany, Austria, Switzerland, Spain, USA)</b>	<b>2023 (incl. USA)</b>	<b>2022 (excl. USA)</b>
Total employees	21,589	20,907
Male	29.6%	29.6%
Female	70.3%	70.3%
Non-binary	0.1%	-
Employees with full-time contracts	14,766	14,413
Male	37.3%	37.5%
Female	62.6%	62.4%
Non-binary	0.1%	-
Employees with part-time contracts	6,823	6,494
Male	13.1%	12.1%
Female	86.9%	87.7%
Non-binary	-	-

## Attractive employer

The Fielmann Group is a family business. As an employee-friendly company, we attach great importance to performance-based pay, reconciling family and free time with the demands of the job, health-promoting working conditions, training and further education opportunities, career opportunities as well as excellent leadership. In an industry with almost full employment, the company's position as an attractive employer is a key competitive advantage. In our core markets, we are the industry's largest employer and training provider.

## Working at the Fielmann Group

**Remuneration.** Customer satisfaction is our most important performance indicator. A significant part of the bonuses paid to store managers and the Management Board is dependent on this factor. We offer our employees the opportunity to acquire an interest in the company. 70% of our employees hold shares of the Fielmann Group AG and receive dividends in addition to their salaries. In terms of minimum remuneration, we are always above the recommendation of the Central Association of Opticians (ZVA). Since 2021, there has been a profit-sharing scheme for the store teams. This team bonus is largely based on the development of customer satisfaction. In this way, the Fielmann Group rewards the dedication, competence and commitment of our employees. Without them, our company's success would not be possible.

GRI 2-30

**Diversity in the workforce.** We attach great value to diversity and consider variety in the workforce as a success factor. The requirements stipulated in the General Equal Treatment Act (e.g. AGG in Germany) are a matter of course for us. We do not discriminate against any employee or customer on the basis of their ethnic background, skin colour, gender, religion or ideology, disability, age or sexual orientation. This is also reflected in our employee survey, which we conducted in June 2023. According to this survey, 79% of participants stated that employees are treated equally within the company, regardless of their background. We are constantly endeavouring to improve on this result. Employees can contact the complaints office (staffed with both male and female contact persons) confidentially in the event of violations of the AGG or if they are involved in any other conflict situations. Since 2023 we have been providing our employees with an e-learning course on diversity and inclusion. In addition, Fielmann has introduced a mandatory training programme for managers in Germany to prevent sexual discrimination, raise awareness of such incidents, and train them in dealing with them in order to prevent discrimination. There is also a digital training programme on this topic for employees in Germany and Switzerland.

The Fielmann Group is a modern, international family business. We embrace diversity and equality as they constitute a key driver in an organisation's performance. To contribute to increased diversity – especially in management – we are constantly monitoring our development across the organisation. In both our new marketing and employer brand campaigns, we have a focus on diversity. At the Fielmann Group AG, more than 30% of managers in the first three levels below the Management Board are female. The percentage of women on the Management Board is 25%.

In cooperation with a specialised service contractor, we offer support for employees facing challenging or difficult personal situations. The free and anonymous service includes individual consultations on parental leave, childcare arrangements, support with questions about illness and the need for care, as well as personal challenges or crises.

**Work-life balance and reconciling work with family life.** We want our employees to be able to reconcile work and free time. For this reason, we provide a wide range of part-time working models. 30% of our employees make use of these options. At our Head Office, we have introduced the possibility of mobile working, which saves employees commuting to work and helps to make work more flexible. In addition, a specialized contractor helps our employees find suitable childcare. Childcare subsidies are paid according to individual needs. In addition, we provided financial support for employees in German metropolitan regions who took advantage of a holiday childcare programme in the reporting year. In 2024 we want to enable new working time models in the stores with modern staff scheduling tools.

**New Work.** Digitalisation, internationalisation, connectivity and ultimately the pandemic have led to a change in the world of work – towards a more flexible, self-determined form of working. The Fielmann Group is establishing modern forms of collaboration within the company. Thanks to our digital employee tools, the majority of our employees in the Head Offices can work flexibly with regard to time, location and resources. With the introduction of cloud-based tools, we are strengthening company-wide networking and knowledge sharing across all locations. Transparent communication and video messages in the company's inhouse social network promote our employees' identification with the company. Another major step was the introduction of a designated HR tool. Since May 2021, many HR processes have been digitalised and integrated in one IT platform. We are continuously working on further digitalising processes.

In 2023 we further developed our workplace concept for the future as part of our "Office 2025" project. Together with a service provider, we conducted a location analysis and ultimately decided to relocate our Head Office to a new, modern office building. We will initially adapt this to our needs and remodel it accordingly so that we can move in in the third quarter of 2025.

In our stores, a healthy work-life-balance is a particularly important topic. As part of a strategic initiative, we are working on combining the needs of customers, employees and the companies by means of new work concepts. In the reporting year, we concluded the selection process for a system provider to improve staff scheduling. The roll-out will take place in 2024.

**Employee satisfaction.** We strive to sustainably increase both employee satisfaction and engagement within a modern corporate culture, which is why we regularly survey it anonymously. In 2023 we conducted another general employee survey and a survey on our Vision 2025 and the process of transformation in the service organisation. The results were published subsequently. Part of the evaluation is the engagement index, which we use to measure the commitment, identification and motivation of our employees. In the reporting year, the engagement index was 3.82 out of a possible 5 points. Our aim is to continuously increase this value by 2025. As part of our HR strategy, we devise suitable

measures in the areas of leadership, work-life balance, training and remuneration on the basis of regular surveys and employee appraisals. Since 2022 we have been conducting staff surveys with a new tool that enables us to evaluate and thus distribute results more quickly. Furthermore, we joined the Racer Benchmark Group in 2022 to benchmark and exchange employee survey results with other large companies.

**Training at Fielmann.** Career opportunities are wide-ranging within the Fielmann Group. Whether in one of our more than 1,000 stores in Europe and the USA, the Fielmann Academy at Ploen Castle, the design studio, the production facilities or the Head Office – an apprenticeship at Fielmann opens a lot of doors.

Our apprentices are the best in the industry. This is confirmed by nationwide awards in Germany. Over the last ten years, Fielmann has won an average of 71% of the regional awards and 88% of the national awards in the German optical industry competition. Every year, approximately 10,500 young people apply for a vocational training course at Fielmann. More than 1,700 young talents start their careers with us.

**Leadership.** Wherever possible, we fill management positions from within our own ranks. We place high demands on our managers. These are reflected in our leadership principles, which are continuously developed in line with the development of our strategy. As part of our comprehensive leadership development programme, we continuously develop our new and long-standing managers in a targeted manner. For this purpose, we offer a wide range of internal training. This includes basic and advanced leadership training, customised team support and mediation as well as individual coaching and external training courses. The programmes also address the health of our employees. We have expanded the internal training offered and restructured it in the reporting year. We offer comprehensive development programmes for our junior managers in the stores. The proportion of women on these programmes exceeds 40%.

At the Fielmann Academy Schloss Ploen, we train our employees for Europe. The Fielmann Academy is also open to external opticians for master craftsman courses and colloquia.

### **Business environment and requirements**

Due to our rapid growth, we are increasing efforts to recruit qualified new employees. The general conditions are challenging: the optical industry and hearing aid business are experiencing almost full employment. Demographic change is reducing the number of school graduates, and fewer young people are opting for vocational training in the trades. With our modern employer branding and recruitment, Fielmann attracts the best applicants in the industry.

The profession of an optician is wide-ranging. When opticians determine the customer's prescription, they are performing a task that, in Germany, is still associated with ophthalmologists. When choosing a frame and lenses with the customer, opticians act as consultants for both fashionable eyewear and good vision. In the workshop, they work as craftspeople. According to legal regulations, only trained opticians may perform eyesight tests as well as fit and dispense prescription glasses.

The work of hearing healthcare professionals is also wide-ranging. Their work boosts the quality of their customers' lives. As experts and empathetic consultants for good hearing, they find individual solutions for customers. As digital craftspeople, they program state-of-the-art hearing aids, adapt them to individual hearing needs and produce perfectly fitting earpieces by hand.

We support the training to become a master optician and master hearing healthcare professional with a wide range of further training programmes and financial assistance. This includes a grant for purchasing learning materials and partial payment of fees up to full funding.

GRI 3-3

### Objectives

Fielmann is not only the market leader in terms of price, but also in matters of quality, service, expertise and training. In particular, the training of our employees is continuously improved and developed. We are continually qualifying and certifying our employees, thus ensuring the professional competence that we guarantee our customers at the store. All our stores in Germany and abroad are managed by certified opticians or optometrists. They are assisted by friendly and competent employees, mainly certified opticians as well. Opticians regard themselves as craftspeople and healthcare providers. In Germany, opticians are permitted to carry out eyesight tests, determine prescriptions and fit contact lenses. They advise their customers on the selection of lenses and frames, and assemble them in the workshop to create individual pairs of glasses. If the stores have associated hearing care studios, these are managed by trained hearing healthcare professionals.

**Newly created jobs each year.** The Fielmann Group is expanding and aims to create new jobs every year.<sup>4</sup>

**Training and professional development.** We train and develop our employees according to their needs. On average, they spend one working week per year on training and professional development measures. There are defined minimum qualification requirements for the positions and areas of activity at the stores. In our hearing aid business a certified management system ensures quality and compliance. This system is subject to annual external audits. We plan to continue our training and professional development measures in the next few years on a similar scale. The colloquia at the Fielmann Academy at Ploen Castle will continue to offer space for exchange between science and practice.

GRI 3-3

### Concepts, management and measures

We can only extend our lead in the market if each and every one of our employees is the best in their field. Satisfied customers are the prerequisite for our success and the basis for the job security we offer our employees. This is why we invest double-digit million amounts in training and development courses every year. In the reporting year 2023, this figure stood at € 20 million.

**Investing in the future.** Our apprentices undertake three years of optical training. The vocational school teaches the theoretical skills and the master opticians in the stores train the artisanship. Additional training courses at the Fielmann Academy at Ploen Castle, the central training workshops, and the training and professional development centre in Offenbach deepen and complement their education. People who take part in training courses at the Fielmann Group will be comfortable at all levels of the optical industry: skilled artisanship, industrial production and professional management. Our customers benefit from our staff's expertise in eyewear design, the aesthetic idea of eyewear, the production of frames and lenses, and the custom manufacturing of the glasses.

<sup>4</sup> Fielmann reports its own key indicators for the "Employment" topic and does not orientate itself to the GRI standard in this case.

With hearing services, we fulfil customer wishes beyond their visual needs. And we are expanding, opening more hearing aid studios. In Germany, Austria and Switzerland, Fielmann trains and develops hearing care professionals. Every year, more than 150 apprentices start their careers as hearing care professionals with us. We actively support the apprentices in career planning and also offer them the opportunity to attend a school for master craftspeople. Through dedicated trainee programmes, we qualify our future leaders.

We offer vocational training at the production and logistics centre in Rathenow: courses in forwarding, warehouse logistics, mechatronics, IT, and industrial mechanics for the optical industry are all available. At the Hamburg Head Office, we provide attractive perspectives with a range of apprenticeships and dual degree courses.

In addition to customer requirements, technical possibilities and trends in fashion are also constantly changing. This is why we train our employees constantly and encourage them to develop and expand their professional expertise in many ways. Our opportunities for development are equally open to everyone. Our regular seminars provide concrete possibilities for personal and professional development.

Depending on the target group, educational goals and content, we provide in-person training, web-based training, e-learning formats, further digital formats or a mix of these. We have also created numerous new subject-specific e-learning modules, which we distribute via our new HR Learning Platform. Classroom events will remain important over the coming years. Digital learning services will aid the learning process both before and after the classroom-based courses, and also enable a form of learning that is independent of time and place. This will enable us to reach more employees in less time and promote work-life balance. In addition, we will enable our staff to better integrate training into their daily work routine.

Our courses offer a wide range of customised training. We develop specialist skills, communication and leadership competencies in a targeted manner. When employees return to the Fielmann Group after a longer period of absence (such as on parental leave), we encourage their gradual reintegration into working life.

**Careers at Fielmann Group.** We place great demands on our managers and, as a rule, develop them from within our own ranks. From an early stage, we encourage young people along their path to leadership: they can test their motivation and ability to become managers during specially designed seminars. In our junior trainee programme, they get the chance to acquire their first experience of leadership in a supervised and guided setting. Many then decide to take a part-time or full-time master artisan course. We also offer master courses at Ploen Castle, both full-time and part-time. State-of-the-art technology combined with innovative teaching methods add to the high standard of our training.

The Fielmann Academy at Ploen Castle was founded as an educational institution for the optical industry. Today, more than 100 instructors and trainers, as well as dozens of other professionals, provide superior training to our employees on subjects such as our company philosophy, optical craftsmanship, frame and lens consulting, eyesight tests and biomedicine.

With our trainee programme, we prepare future managers for the demanding work involved in running a store. Further development is aided by targeted training sessions and experienced trainers in the stores. In addition, the Fielmann Group offers a broad variety of career paths in the stores and beyond.

### Results in the reporting year

We are continuing to expand and are increasing our efforts to recruit qualified new employees. With only 5% of all optical stores, we train more than 40% of Germany's future opticians. After successfully completing their training, we employ around 75% of the graduates – more than 4,000 in the last five years. As at 31 December 2023, 4,058 apprentices (previous year: 4,107) were learning their trade with Germany's market leader.

**Newly created jobs each year.** In 2023, we created 781 additional jobs (previous year: 603).

**Training days.** In the reporting year 2023, we invested € 20 million in training and continued professional development. On average, our employees in Germany, Austria, Switzerland, Spain, Luxembourg, the Netherlands, Italy and Poland attended 5.7 days of continuing education and training in 2023 (previous year: 5.8 days). There was also a wide range of online events that we made accessible via learning platforms.

### Training days

	2023			2022		
	Number of employees	Working days for training and professional development	Average number of training and professional development days	Number of employees	Working days for training and professional development	Average number of training and professional development days
Entire workforce	22,030	125,234	5.7	21,658	125,536	5.8
Male	6,527	43,825	6.7	6,411	41,317	6.4
Female	15,484	82,306	5.3	15,236	84,209	5.5
Non-binary	19	4	0.2	-	-	-

GRI 404-1

## Employee health and hygiene

### Business environment and requirements

Our employees should be able to be healthy, motivated and productive in their work. This benefits each individual employee as well as the company, because health and well-being are key factors in attracting and retaining employees in our company.

GRI 3-3

### Objectives

Protecting the health of our employees and ensuring the highest possible hygiene standards at work are core components of our HR strategy. We promote health and well-being, while reducing infection risks and resulting absences.

**Inability-to-work rate under 5%.** We aim to continuously keep the inability-to-work rate below 5%.

**Introduction of further measures for protecting employee health.** We protect our employees' health, analyse the status quo, identify specific needs, derive suitable measures and implement them quickly.

GRI 3-3

### Concepts, management and measures

In order to protect our employees' health, we identify activity-related risks and derive preventive measures. Today, we work according to a scientifically based hygiene concept which we created in partnership with Professor Dr Martin Exner, one of the leading infectiologists in Germany. In addition, we cooperate with various service providers in an effort to promote employee health. Together with a specialised contractor, we offer our employees free and anonymous support in challenging life situations and organise therapy quickly if needed. The service is available around the clock. Employees at our production and logistics centre in Rathenow also receive support in the form of a psychosocial consultation hour. There, we offer subsidised access to a nationwide network of thousands of sports, fitness and wellness facilities via another specialised contractor. In Rathenow and the Hamburg Head Office, we offer employees annual flu vaccinations. We will also ensure a healthy working environment as part of the new workplace concept for the new Head Office in Hamburg. Managers also play a key role in employee health as they have a large influence on their teams' mental well-being and motivation – and ultimately on their ability to work and be employed. Our leadership guidelines define clear expectations, while training and coaching help our managers in challenging situations and with the further development of their leadership skills. Controlling, monitoring and managing the measures is the responsibility of the HR department. This includes controlling the key figures, particularly the inability-to-work rate and the evaluations from the health insurance companies, from which we derive further measures for promoting health. Leadership development, work-life balance and health management are key components of our HR strategy.

GRI 3-3



### Results in the reporting year

The health and safety of our customers and employees has always been our top priority. The Fielmann Group responded early and decisively to the spread of the coronavirus pandemic in 2020. Together with Professor Dr Martin Exner, President of the German Society of Hospital Hygiene (DGKH), we defined a set of hygiene standards that comply with essential healthcare for opticians and hearing care professionals, while also protecting the health of our customers and employees. Our stores were fitted with substantial supplies of face masks, single-use gloves and disinfectants. Our hygiene concept reliably protects against infections: a report compiled at the end of 2020 by the same team of experts led by Professor Dr Exner found that the infection levels at our German stores were considerably below the general infection rate in Germany.

**Inability-to-work rate under 5%.** In 2023, the inability-to-work rate in Germany was 6.8% (previous year: 7.3%). We have already been able to significantly reduce the inability-to-work rate for work compared to the previous year. And we are confident that we will achieve our target of less than 5 per cent through continuous measures benefitting the health of our teams.

### Introduction of further measures for protecting employee health.

In order to further invest in our employees' health in the future, we have a position for occupational safety and health management at the Head Office since 2022.

Following a Head Office survey in 2022, a cross-functional team continues to work on creating a working environment that increases the productivity, health and general satisfaction of employees. At the heart of the project lies the question of what we need to offer our employees in order to work as well as possible in a healthy and sustainable environment. The findings will ultimately improve the overall customer and business value we generate at the Fielmann Group.

Thanks to our digital employee tools we offer remote work for the majority our office staff and we will also continue this policy post-pandemic. This is one example of how we can positively affect our employees' work-life balance and reduce resources as a consequence of less commuting.

Accidents at work in Germany	2023			2022		
	Number	Resulting days of absence	Absences per 1,000 employees	Number	Resulting days of absence	Absences per 1,000 employees
Accidents at work	243	2,975	13.98	128	2,012	7.47
Commuting accidents	167	2,106	9.60	117	1,762	6.83
Deaths	0	0	0	0	0	0
Total	410	5,081	23.58	245	3,774	14.30

GRI 403-9



## Responsibility for our society

### Social responsibility

As a family business, we assume responsibility for our customers, our employees and for society. We think long-term and believe that investing in society is an investment in the future. As the market leader, we campaign for nature and society. We are committed to the society in which we live and work because we understand that a company can only enjoy long-term success in an intact, well-balanced social environment. And we want to give back something of what we receive through the community.

In 2022 more than 1,100 colleagues from nine countries co-created the values that unite us as well as our purpose “We help everyone hear and see the beauty in the world”. This sums up the ambition of our family business to ensure that great hearing and vision is affordable for everyone and to thereby break down inequalities in people’s health care.

We respect human rights and abide by the law, both locally and internationally. We demand the same from our employees and our business partners. Misconduct by an individual can cause enormous economic damage. Even more serious, however, is the loss of trust that can accompany violations of the law.

Our Code of Conduct, enhanced in 2023, is a guideline adopted by our Management Board that defines ethical standards based on our shared values and thus ensures that we act responsibly and comply with applicable laws and regulations. It applies to all areas of our Group and in all countries in which we are active.

We have also drawn up a Declaration of Principles on Human Rights.

Furthermore, we expect our business partners to respect human rights and honour the ecological and social standards we set for ourselves. Our Code of Conduct for Suppliers obliges our suppliers to comply with these standards.

GRI 2-23

### Business environment and requirements

We assume responsibility where our company is economically active and where help is required. We are particularly committed to the environment and nature protection, education and research as well as the preservation of historical monuments and culture. We encourage investments in infrastructure and services. Our focus lies on long-term partnerships with charitable, regional organisations.

GRI 3-3

### Objectives

Every year, we plant a tree for each employee, initiate and promote long-term projects in nature conservation and environmental protection, support nurseries and schools and sponsor a wide range of youth sports.

**Planting trees.** The tree is the symbol of life and protecting nature is an investment in the future. As early as 1986, we set our objective in our environmental pledge to plant a tree for each employee every year. We are still fulfilling this commitment today.

**Investing in young talent.** We donate kits and equipment, provide prizes and trophies, and promote youth tournaments and competitions. Today, more than 40,000 children and teenagers play sports in Fielmann shirts. We want to continue our commitment in the coming years and sponsor around 400 teams per year.

**Funding museums and archives.** We support municipal and local museums, city archives, historical and patronage associations and libraries. To do so, we invest a significant six-figure sum to achieve around 50 donations per year. This commitment began in 1998 with the donation of a painting by the Renaissance painter Lucas Cranach to the Schleswig-Holstein State Museums at Gottorf Castle. Our museum sponsorship programme celebrated its 25th anniversary in the reporting year. In the future, too, we want to be involved on a similar scale.

GRI 3-3

### **Concepts, management and measures**

The social activities of Fielmann have been coordinated by the Communications and Public Relations department for decades. This department reports directly to the Chief Executive Officer, Marc Fielmann, and is also responsible for documenting and publishing the company's commitment. The Chief Executive Officer decides on the amount and manner of the involvement, in accordance with the provisions of the German Stock Corporation Act (AktG), the Articles of Association and the Rules of Procedure for the Management Board.

**Protection of environment and nature.** Fielmann has been active in nature conservation and environmental protection for many decades. Together with nurseries and schools, we create green classrooms and playgrounds, plant biotopes and orchards with cities and municipalities, and support reforestation and renaturation projects. We also support larger activities that benefit the community.

Fielmann co-founded an initiative with the federal state of Schleswig-Holstein in 2019 called "Einheitsbuddeln". It invites citizens as well as local governmental entities to plant trees for German Unity Day. After making donations over the last four years to the federal states organising this at the time, Fielmann presented 12,000 trees to the German federal state of Hamburg in August 2023.

**Commitment to youth sports.** Fielmann takes up the idea of team spirit and the concept of developing young talent by supporting youth sports. We donate kits and equipment, offer prizes and cups, and also sponsor tournaments and competitions. We regard the youth work undertaken by regional sports clubs as an important social contribution to our society.

**Fielmann Academy at Ploen Castle.** The Fielmann Academy purchased Ploen Castle in January 2002 from the federal state of Schleswig-Holstein. Fielmann preserves this heritage site for the good of society. The Fielmann Academy at Ploen Castle regularly hosts meetings for the worlds of politics and business, arts and culture. Since its reopening in 2006, more than 171,000 visitors have taken the opportunity to visit the castle and its historic rooms.

The Fielmann Academy at Ploen Castle regularly organises colloquia on optical and ophthalmological subjects. The aim of these events is to provide a forum for presentations and further training involving opticians, doctors, students and scientists. The colloquia were first held in 2007. Since then, they have become established as a permanent institution for science and practical application. In total, more than 8,900 visitors have attended 60 events to learn about the latest developments in the optical industry. Since 2020 the colloquia have been held digitally. In Poland too, we have been committed for many years to supporting optical schools and universities that train opticians.

**Supporting museums.** For many years, we have also been supporting local museums, archives and historical societies holding regional collections as well as all kinds of cultural institutions. We fund selected exhibits, support and facilitate restorations, and advise small volunteer-run local museums in cooperation with the state museum association.

GRI 3-3

### Results in the reporting year

In the fields of infrastructure investments and subsidised services, we were not able to meet all the 2023 targets we had set ourselves to the extent we would have liked.

**Planting trees.** In 2023, we planted a total of 14,577 trees (previous year: 37,251) and 2,960 bushes (previous year: 2,740) in Germany, Switzerland, Austria and Italy. In 2023 the number of trees planted fell below our target. The reason for this is that in 2022 we brought forward numerous plantings planned for spring 2023 due to weather conditions or at the special request of the tree planting partners. If we take both years together, the large number of trees planted in 2022 meant that we significantly exceeded our environmental pledge overall. We are thus making an important contribution to the climate in the region.

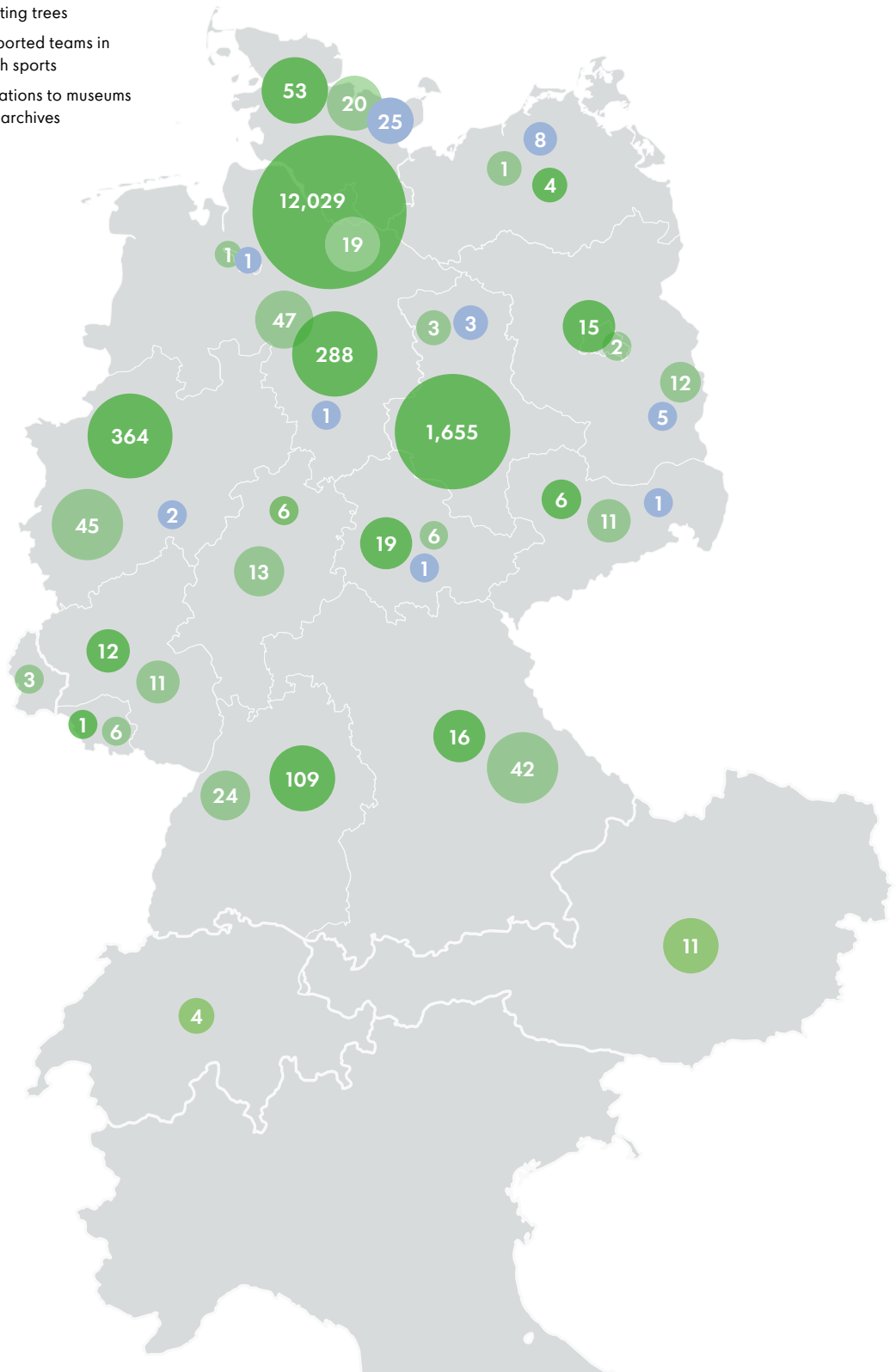
**Investing in young talent.** In 2023, we sponsored 281 teams in youth sports (previous year: 268).

**Funding museums and archives.** In 2023, we were again involved in promoting culture with 47 donations (previous year: 35).

### Social contributions in 2023

GRI 203-1

- Planting trees
- Supported teams in youth sports
- Donations to museums and archives



## Social standards in the value chain

As the market leader, the Fielmann Group takes responsibility for its customers, its employees, society and the environment. We are convinced that our company can only thrive in an intact and socially well-balanced environment.

Investments in the community are investments in the future. The Fielmann Group respects the law. This applies regardless of whether it is supranational or local law. We demand the same from our employees as well as from our business partners. Our company is characterised by trusting and responsible dealings with each other, respect for human rights, the protection of natural resources and our approach to business. With this in mind, we have further developed binding guidelines for our employees and suppliers in the form of our Code of Conduct for the Fielmann Group, our Declaration of Principles on Human Rights and our Code of Conduct for Suppliers. These guidelines address the prohibition of corruption and bribery, the regulation of invitations and gifts, the guarantee of health and occupational safety, environmental protection and energy efficiency, and the legal obligations to prevent money laundering.

Equal opportunities and equal treatment of employees should be encouraged, irrespective of ethnic background, gender, religion or ideology, disability, age or sexual identity. The personal dignity, privacy and personal rights of each individual must be respected. Forced labour is not tolerated, nor is unreasonable treatment of workers, psychological cruelty, sexual and personal harassment or discrimination.

In the event of violations of these obligations, we will take action and reserve the right to terminate the contractual relationship with non-compliant suppliers.

GRI 2-23 GRI 3-3

## Business environment and requirements

The Fielmann Group has shaped the optical industry and covers the entire value chain. At our largest manufacturing site in Rathenow, more than 1,000 employees produce millions of plastic and mineral lenses. They fit the customised lenses into the ordered frames before we deliver the goods to our stores overnight. In 2023, we supplied 4.14 million lenses in a range of coatings and finishes, and 6.71 million frames (previous year: 4.32 million lenses, 6.59 million frames).

We manufacture in Rathenow using the latest technology and pay attention to environmentally friendly and healthy production steps as well as good working conditions. A quality management system set up according to ISO 9001 ensures a standardised organisation with highly automated manufacturing and testing processes. This ensures consistently high quality.

We only sell branded products if manufacturers guarantee compliance with the strict quality standards demanded by the Fielmann Group. The high standards we set in our own production also apply to the suppliers, partners and manufacturers we work with.

Our business environment has changed in recent years. New legal requirements, such as the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz), came into force on 1 January 2023. Applicable to companies of the size of the Fielmann Group, they pose a variety of new reporting requirements. For over one year a cross-functional team has been working on the Fielmann Group's compliance to adopt the new legal requirements in respect of the law mentioned above. This team has already launched several measures, which include performing a risk analysis to monitor human rights and environmental risks in the supply chain, adapting the current Code of Conduct for suppliers and setting up a complaints procedure.

GRI 2-23 GRI 3-3

### Objectives

The Code of Conduct for suppliers contains a catalogue of basic values that ensure responsible and ethical behaviour along the entire supply chain of the Fielmann Group. All infringements against the basic principles and requirements of the Code of Conduct are regarded by us as a significant impairment to the contractual relationship.

In the event of suspected non-compliance with the principles and requirements of the Code of Conduct for suppliers, Fielmann Group AG reserves the right to request information on the relevant facts. In the event of a breach, Fielmann Group AG has the right to terminate any or all contractual relationships with suppliers who fail to comply with or breach the Code of Conduct without notice.

**Review of suppliers.** Our objective is to sell frames, lenses, sunglasses, contact lenses, and hearing aids exclusively from suppliers who comply with the Fielmann standards in the Code of Conduct with regard to social compatibility, working conditions and environmental protection (target level: 100%).

GRI 2-23 GRI 3-3

### Concepts, management and measures

Wherever we purchase our main products from third parties, we also transfer the standards of our responsibility towards society, the environment and employees to our suppliers. It is important to us that our partners live up to the same ecological and social standards that we apply to ourselves. We aim to offer our customers products of an ideal quality that have been produced in compliance with social and ecological standards. We therefore only work with renowned, reliable partners, and invest in long-term, trust-based business relations. The ethical principles of potential business partners and compliance with them are a key criterion for us when selecting new suppliers. When entering into a business relationship with the Fielmann Group, suppliers pledge not only to comply with our Code of Conduct for suppliers on their own premises, but also that their subcontractors do so. The jointly signed Code of Conduct enables the Fielmann Group to check compliance with the standards by our trade and business partners at any time. We also obtain our own impression of the conditions through additional visits to suppliers and production sites.

GRI 2-23 GRI 3-3



**Results in the reporting year**

Continuing our long-term collaboration with reliable partners proved to be a successful approach in the reporting period, too.

**Review of suppliers.** In the reporting year, 100% (in terms of purchasing volume) of our current and new suppliers of frames, lenses, sunglasses, contact lenses and hearing aids have committed to the Code of Conduct.

GRI 414-1



## Responsibility for our environment

### **Responsible use of resources**

In terms of environmental protection, the Fielmann Group attaches great importance to conserving resources and making production more sustainable. To achieve this, we are constantly testing new approaches. In 2022 we launched our sustainable frame collection made with recycled acetate, followed by another sustainable frame collection made with bio-based acetate. To verify our progress in becoming more sustainable, we rely on the ISCC PLUS standard (International Sustainability and Carbon Certification). We use the ISCC PLUS trademark on products to certify the ratio of recycled raw materials throughout the entire supply chain, which attests to the sustainability of the models in our "Sustainable collection". In 2023 Fielmann introduced 14 additional models containing recycled acetate – an increase of 15 per cent compared to the previous year. Fielmann is constantly striving to further increase the proportion of sustainable raw materials in the Fielmann collection and to offer additional models made from recycled acetate in 2024.

### **Saving energy and reducing emissions**

As a global company, we are committed to contributing our part in systematically reducing climate-damaging emissions. Drawing on our constantly growing database and advanced technology, we will continue to reduce emissions over the coming years. We plan to do so in stores, our manufacturing and logistics facilities, the Fielmann Academy at Ploen Castle and our Head Offices premises. The topic of energy efficiency and environmental protection is deeply rooted in strategy of the Fielmann Group and is clearly defined in our organisation. The Management Board has set qualitative targets for energy efficiency and emissions reduction, while the quantitative targets are updated as part of the annual planning process.

### **Business environment and requirements**

High-quality lighting and suitable air conditioning are important for our customers and employees in our stores. However, these factors also have a considerable impact on our energy consumption and CO<sub>2</sub> emissions. Furthermore, we use significant amounts of energy to run the Fielmann Academy at Ploen Castle, the production and logistics facilities and the Head Offices premises. The company vehicle fleet also contributes to CO<sub>2</sub> emissions.

We rent most of our store locations. For most of the rented sales areas, for example in shopping centres, the heat suppliers are contracted by the owners. In such cases, we are not usually able to influence the energy mix. However, the number of shopping centres and buildings where a certification process governs compliance with specific environmental standards is continuously increasing. This includes, for example, consumption-optimised lighting or ultra-efficient cooling systems, which help reduce CO<sub>2</sub> emissions and lower energy costs. A large number of the shopping centres in which Fielmann stores are located have now been certified. In Germany, most of these have been certified in accordance with the standards of the German Sustainable Building Council (DGNB).

Our Head Office in Hamburg will also relocate into a DGNB-certified building in 2025. In addition, one of our stores in Luxembourg is located in the country's first shopping centre to be awarded the "BREEAM Excellent" sustainability certificate and three of our Spanish stores are also located in BREEAM-certified shopping centres. In several other buildings, the information provided is often incomplete, particularly with regard to heating. For this reason, the following details mainly refer to the locations where Fielmann manages the electricity and gas contracts itself. In the financial year 2023, this was 614 for electricity in Germany (previous year: 615) and 147 for gas (previous year: 127). In these locations, we can determine key figures and implement measures. For the other locations we have created systems to record data from heating bills. This means that, if they are available, we can compare bills between different premises and draw landlords' attention to optimisation potentials. Comparing invoices individually and checking whether they are plausible in terms of consumption is already standard practice.

GRI 3-3

### Objectives

We aim to continuously reduce the energy consumption and emissions per m<sup>2</sup> of our stores, Head Offices and production sites. In addition, we want to establish continuous energy measurement in every store so that we are able to leverage energy saving potential. The continuous energy metering we have already installed helps us achieve this goal.

**Energy consumption per m<sup>2</sup>.** Our aim is to continuously reduce energy consumption per m<sup>2</sup>. For the following years, we have planned various initiatives to improve our energy efficiency even further. For 2024, we have set ourselves the target of reducing our total energy consumption by 3%. In order to achieve this, we have carried out all economically viable conversions. The aim is to convert the remaining stores by 2025 and switch to LED lights as part of this process.

**Reduction of CO<sub>2</sub> emissions per m<sup>2</sup>.** We aim to reduce harmful CO<sub>2</sub> emissions caused by our business activities and reach net zero by 2040. With our constantly growing database and developments in technology, we will review this goal within the next few years and strive for an earlier achievement.

We aim to continue developing the portfolio of refrigerants to create a new, low-emission refrigerant blend. Here, too, the first step is to create the data basis for detailed and prioritised implementation.

GRI 3-3

### Concepts, management and measures

In terms of environmental and climate protection, it is important to us to consider the entire life cycle of a building that we acquire, build or renovate. A sustainability assessment of Fielmann Group AG's entire property portfolio is not usually possible from an energy perspective as the majority of properties are listed buildings, often with historic fabric, in a complex development structure.

However, we work with internal and external experts on every property purchase in an effort to maintain or improve the energy aspects of the building – if possible before the purchase, but no later than during the construction phase. We ensure precise building documentation in order to manage the building sustainably while it is being used.

The relevant building regulations from the Energy Conservation Ordinance or the Energy Conservation Act are implemented in technical terms as far as possible. Unfortunately, 100% optimisation is not possible with all buildings. As part of a cost-benefit consideration, however, we seek to achieve the best possible condition for each building. In 2023 the cross-departmental Energy and Environment Team continued to develop the catalogue of measures based on the previous years' energy audits and defined the necessary process changes. The team reports to the Management Board once a quarter. If measures appear appropriate, they will be approved and implemented by the Management Board. The Management Board is responsible for the strategy on energy efficiency and emissions reduction. In 2023 the energy audit certified that the Head Office, the Fielmann Academy at Ploen Castle and the manufacturing site in Rathenow had implemented the energy-saving measures successfully and in a structured manner.

We have implemented a comprehensive collection and reporting system for energy efficiency and emissions. As part of a systematic approach, all accessible consumption data is fully recorded.

Energy consumption from our own electricity and gas contracts in Germany, Austria and Switzerland is already collected and documented in a comprehensive reporting system by the central energy purchasing department at meter level.

**Measures for more efficient energy consumption.** As part of the 2023 energy audit, we have defined measures to further improve the energy efficiency of Fielmann Group AG. These include checking and reducing the base load (average load on the electricity grid) and continuously raising employee awareness of energy-efficient behaviour. The fixtures & fittings department plays a key role here as it is responsible for maintenance work, building repairs and the elimination of construction defects in the stores. The administrative processing and implementation of the required work are based on uniform standards. For several years now, we have been using energy-efficient LED lighting to sustainably reduce energy consumption. By switching from conventional light sources to LEDs, the power consumption per m<sup>2</sup> can be significantly reduced. This measure alone often reduces the total electricity consumption per m<sup>2</sup> in the stores by more than 40%. We are continuously working together with our lighting suppliers in order to utilise the most efficient LED technology. As a result, we have managed to reduce the energy consumption of our product presentation by 25% while maintaining the same quality of lighting. In the event of technical problems that impact a store's energy consumption, notifications will be sent systematically and processed centrally until they are resolved. In our own property portfolio, we have also been gradually converting the lighting systems for which we are responsible to energy-saving LED lighting for years. This usually includes the general areas, the outside lighting, stairwells, basements, technical areas and garages.

In addition to lighting, air conditioning systems are also a major driver of energy consumption. We therefore use renovations, relocations and new openings to install highly efficient air conditioning systems.

Rooftop areas suited for the installation of photovoltaic systems have already been selected, and the modules concerned have been ordered.

At our production site in Rathenow, we had to postpone the construction of the photovoltaic system with a nominal output of 912 kWp. This was because a new medium-voltage system was required to feed power into the public grid. The plant is now expected to go into operation in 2025.

Since the reporting year, we have been utilising waste heat to heat buildings and hot water thanks to a heat recovery system on the air compressors. This system enables us to reduce our gas consumption by around 200,000 kWh per year.

By replacing refrigeration units for process cooling, we are making significant energy savings by utilising "free cooling". The process of switching completely to LED lighting is also ongoing.

**Improving the corporate carbon footprint.** The measures presented for improving energy efficiency make a significant indirect contribution to reducing the Fielmann Group's emissions. Furthermore, we use a cogeneration unit with combined heat and power at Ploen Castle. This resource-efficient plant produces up to 42% of the castle's daily power requirements, while also covering the heating needs.

Since 2021 we take part in the rating process of CDP (formerly the Carbon Disclosure Project), an international non-profit organisation that helps companies and cities disclose their environmental impact. This includes the gathering of information for a corporate carbon footprint, which helps us to get better insights on where most of our CO<sub>2</sub> emissions occur. In 2024 we will identify an overall CO<sub>2</sub> footprint as part of implementing the Corporate Sustainability Directive (CSRD) and, based on the results, define appropriate measures to further reduce CO<sub>2</sub> emissions.

In Germany we promote the use of public transport, as this can reduce CO<sub>2</sub> emissions by 73% compared to using a private vehicle, according to a study by the Institute for Energy and Environmental Research Heidelberg. Since May 2023 we have been offering our German employees the Deutschlandticket at discounted rates instead of the so-called Jobtickets. This ticket gives them free use of public transport throughout Germany. In the financial year 2023, 4,509 employees took advantage of this offer (previous year: 2,516). As part of the "bahn.business" business customer programme, Fielmann employees travelled a total of 6,892,842 CO<sub>2</sub>-neutral kilometres on the DB rail network (previous year: 7,606,435). Since 2018, we have also offered our employees favourable conditions for leasing company bikes. In the financial year 2023, 1,360 employees took advantage of this offer (previous year: 1,507). At the same time, the more than 300 vehicles in our company fleet are gradually being replaced by more energy-efficient models.

At our largest production and logistics facility in Rathenow, we developed a green logistics concept aimed at significantly reducing the movement of goods through consolidation. Efficiency is increased even further by dynamic route planning.

In addition, we continuously assess new technologies in order to optimise our processes, such as paperless order picking to save paper. When shipping goods, we only use cardboard packaging with a high recycling ratio that can be reused via the RESY system. Our B2C carton board range is now made from FSC-certified recycled carton board, while we continue to examine and test the use of reusable packaging in B2B transport. We are also trying to avoid plastics or replace them with alternative materials.

In addition, since August 2023, the demo lenses that support the unglazed frames have been gathered at our central eyewear production facility in Rathenow to be picked up and recycled by a certified waste disposal company. We were able to save CO<sub>2</sub> emissions by feeding used paper and plastics into the recycling process.

Since 2017, Fielmann Group AG has been working successfully with the non-profit IT company AfB (Work for People with a Disability). People with disabilities upcycle second-hand and discarded IT hardware so that it can be used again. By extending the service life of these computers, more than 1,000 t of CO<sub>2</sub> was saved over the last few years.

The total of more than 1.7 million trees and bushes planted by Fielmann ensure the long-term and sustainable storage of CO<sub>2</sub>. We will continue to plant a tree for each employee every year.

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### **Results in the reporting year**

With the strategy for energy efficiency and emissions reduction, the integration of the energy team and the catalogue of measures, the Management Board has taken appropriate steps to sustainably improve Fielmann's energy and corporate carbon footprint.

**Energy consumption per m<sup>2</sup>.** In 2023 the Fielmann Group converted 70 stores to LED lighting. This will lead to average energy savings of around 40 per cent per store. In addition, we have switched 59 stores to LED lighting as part of refurbishment work, whilst also installing more efficient air conditioning and ventilation systems.

**Purchased electricity in 2023.** We use certified green electricity in Germany, Austria, Luxembourg, Switzerland, Italy and the Netherlands.

Fielmann Group AG's energy consumption in Germany, Austria, Switzerland and Spain, broken down according to the main sources of consumption:

## Consumption of electricity

in kWh

	2023	2022
<b>Stores<sup>5</sup></b>		
Electricity consumption	32,694,686	34,043,021
Electricity consumption per m <sup>2</sup>	148	160
<b>Fielmann Academy at Ploen Castle and Head Offices</b>		
Electricity consumption	1,722,320	2,132,333
Electricity consumption <sup>5</sup> per m <sup>2</sup>	36	45
<b>Production and logistics centre</b>		
Electricity consumption	6,390,600	6,781,597
Electricity consumption <sup>5</sup> per m <sup>2</sup>	225	239

## Consumption of gas

in kWh

	2023	2022
<b>Stores</b>		
Gas consumption	3,350,771	4,820,059
Gas consumption per m <sup>2</sup>	90	114
<b>Fielmann Academy at Ploen Castle and Head Offices</b>		
Gas consumption	2,024,013	1,929,504
Gas consumption per m <sup>2</sup>	233	222
<b>Production and logistics centre</b>		
Gas consumption	2,529,188	2,778,379
Gas consumption per m <sup>2</sup>	89	98

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Although the Fielmann Group grew in 2023, we were able to reduce our electricity consumption by a total of 5.6% compared to the previous year. These savings are primarily due to the use of LED lighting technology and modern air conditioning and ventilation systems. We have reduced electricity consumption at our head office in Hamburg by around 19% through switching off local servers.

Since December 2017, Fielmann has relied on the key technology of combined heat and power (CHP) in the form of cogeneration units. These units are particularly resource-friendly and low in CO<sub>2</sub> production, as they produce heat and power simultaneously. This cogeneration of heat and power ensures that the gas used as fuel can be employed much more sparingly and efficiently than in separate production processes. In addition,

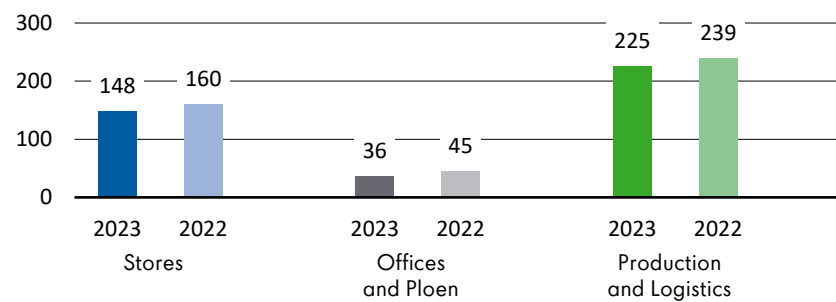
<sup>5</sup> Electricity consumption: Including sales spaces that have been renovated within the reporting period. Electricity consumption per m<sup>2</sup>: Adjusted for sales spaces where electricity consumption could not be measured for the year as a whole due to, for example, renovations.



the generated heat and power can be used straight away, meaning that there is no need for lengthy transport that may also result in losses. The use of cogeneration units results in primary energy savings, which indirectly leads to a reduction of CO<sub>2</sub> and harmful emissions compared to other modern types of power station.

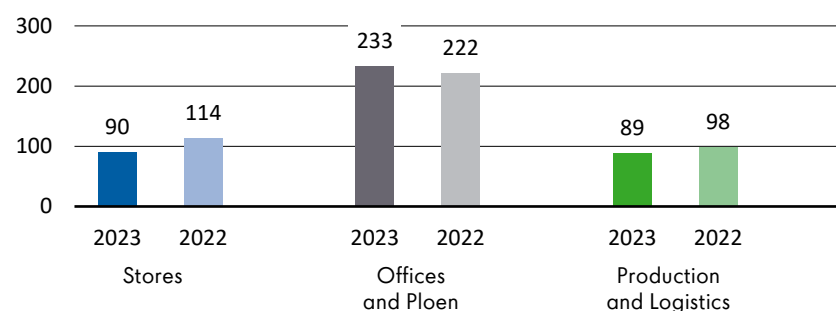
### Consumption of electricity

in kWh/m<sup>2</sup>



### Consumption of gas

in kWh/m<sup>2</sup>



**Reduction of CO<sub>2</sub> emissions per m<sup>2</sup>.** We consume certified green electricity in the reported countries and therefore do not cause any CO<sub>2</sub> emissions when using electricity. The definition of greenhouse gas emissions is based on different methods. We use the Greenhouse Gas Protocol Standard (GHG Protocol) for our definition. It was developed by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD).

The GHG Protocol contains a classification of emissions. It distinguishes between Scope 1, Scope 2 and Scope 3 emissions. Scope 1 includes the emissions produced by the company itself. We have therefore decided to record the CO<sub>2</sub> emissions based on this established Scope 1 approach.

In the following, the results of the Scope 1 CO<sub>2</sub> emissions are presented. Besides carbon dioxide (CO<sub>2</sub>), other climate-damaging greenhouse gases are also taken into account in terms of carbon dioxide equivalent (CO<sub>2</sub>e).<sup>6</sup>

<sup>6</sup> Besides CO<sub>2</sub>, methane and nitrous oxide, for example, are also greenhouse gases. In order to compare the various greenhouse gases, the effect of each greenhouse gas is converted to carbon dioxide. For example, 1 kg of methane corresponds to 21 kg of CO<sub>2</sub>e.

**Scope 1 CO<sub>2</sub> emissions**

Emission source	2023		2022	
	CO <sub>2</sub> e/t	Percentage	CO <sub>2</sub> e/t	Percentage
Stationary combustion	1,105	46%	1,267	49%
Company vehicle fleet	1,297	54%	1,296	51%
Total	2,402	100%	2,563	100%

We use the operational control approach to consolidate our greenhouse gas emissions as per Scope 1. Stationary combustion covers all locations with their own gas contracts; bills paid by owners are not taken into account. The data of our company cars was collected on the basis of the provided fuel card bills. Since 2020 our vehicle fleet's absolute CO<sub>2</sub> emissions have been 30% below previous years.

Our overall focus is on reducing energy consumption and emissions as sustainably as possible. This also takes into account the technical and economic possibilities resulting from modernisations and conversions.

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# Annex

## EU-Taxonomy

### Background information and reporting requirements

In March 2018, the Action Plan on Sustainable Finance was adopted by the European Commission. One of the aims of this Action Plan is to “reorient capital flows towards sustainable investment in order to achieve sustainable and inclusive growth”.<sup>7</sup> The EU Taxonomy Regulation,<sup>8</sup> that contributes at achieving this objective, was published in the Official Journal of the European Union on 22 June 2020. It became effective in July 2020 and introduces a classification system for environmentally sustainable economic activities. In this context, the Taxonomy Regulation specifies six environmental objectives:

1. Climate change mitigation
2. Climate change adaptation
3. The sustainable use and protection of water and marine resources
4. The transition to a circular economy
5. Pollution prevention and control
6. The protection and restoration of biodiversity and ecosystems

For determining the conditions under which an economic activity is environmentally sustainable in accordance with the EU Taxonomy Regulation, the European Commission adopts Delegated Acts which contain technical screening criteria. The Climate Delegated Act<sup>9</sup> with its Annexes defines the technical screening criteria for the first two environmental objectives of climate change mitigation (Annex I) and climate change adaptation (Annex II). The Environmental Delegated Act<sup>10</sup> contains the technical screening criteria for the last four environmental objectives for the sustainable use and protection of water and marine resources (Annex I), the transition to a circular economy (Annex II), pollution prevention and control (Annex III) and the protection and restoration of biodiversity and ecosystems (Annex IV).

An economic activity which is described in Annex I or Annex II of the Climate Delegated Act as well as in Annex I to IV of the Environmental Delegated Act is Taxonomy-eligible, irrespective of whether that economic activity meets any of the technical screening criteria.<sup>11</sup> In addition to this, an economic activity is as environmentally sustainable or Taxonomy-aligned if it fulfils the following “minimum safeguard” requirements of Article 3 of the EU Taxonomy Regulation:

- it contributes substantially to one or more of the environmental objectives by complying with the respective technical screening criteria
- it does not significantly harm any of the environmental objectives by complying with the respective technical screening criteria
- it is carried out in compliance with the minimum safeguards representing procedures to ensure the alignment with
  - the OECD Guidelines for Multinational Enterprises and
  - the UN Guiding Principles on Business and Human Rights,

<sup>7</sup> European Commission (2018), Action Plan: Financing Sustainable Growth, p. 2.

<sup>8</sup> Regulation (EU) 2020/852.

<sup>9</sup> Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Regulation (EU) 2021/2139 of the European Parliament and of the Council.

<sup>10</sup> Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council.

<sup>11</sup> Article 1 of the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council.

- the eight fundamental conventions identified in the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work and
- the International Bill of Human Rights.

Pursuant to Article 8 of the EU Taxonomy Regulation, companies which are required to disclose a non-financial declaration must supplement this non-financial declaration by the following information:

- the proportion of turnover<sup>12</sup> derived from products or services associated with environmentally sustainable economic activities; and
- the proportion of capital expenditure (CapEx) and
- the proportion of operating expenditure (OpEx) related to assets or processes associated with environmentally sustainable economic activities.

The Delegated Act on Article 8 of the EU Taxonomy Regulation<sup>13</sup> specifies the content and the presentation of the information to be disclosed with regards to the three KPIs (turnover, CapEx and OpEx). The present reporting requirement involves all six environmental objectives of Climate Delegated Act and Environmental Delegated Act. As of financial year 2021, the Fielmann Group reports the proportion of Taxonomy-eligible and Taxonomy-non-eligible economic activities in total turnover, CapEx and OpEx supplemented by qualitative information. Disclosures on Taxonomy-alignment are required from financial year 2022 onwards. The disclosure of comparative figures for Taxonomy-aligned economic activities is compulsory as of financial year 2023.

### **Identification of Taxonomy-eligible economic activities**

Fielmann conducted a detailed analysis of its business activities in order to identify economic activities which are Taxonomy-eligible on the basis of Annex I and Annex II of the Climate Delegated Act and Annexes I to IV of the Environmental Delegated Act. The business activities of the Fielmann Group primarily comprise the manufacture and sale of visual aids and other optical products as well as the merchandise of hearing aids. At the current stage, these business activities are neither covered by Annex I or Annex II of the Climate Delegated Act nor by Annexes I to IV of the Environmental Delegated Act. Therefore, they are not Taxonomy-eligible. This implies that our primary business activities are not determined as significant sources of greenhouse gas emissions.

### **Proportion of KPIs associated with environmentally sustainable economic activities**

#### **Turnover (Sales revenue)**

$$\text{Proportion of Taxonomy-eligible turnover: } \frac{\text{Taxonomy-eligible turnover}}{\text{Total turnover}}$$

Pursuant to the Delegated Act on Article 8 of the EU Taxonomy Regulation, Taxonomy-eligible turnover (numerator) is derived from products or services associated with Taxonomy-eligible economic activities.

Total turnover (denominator) corresponds to the consolidated net turnover in accordance with IFRS 15. It represents the consolidated sales of € 1,971.4 million in our consolidated

<sup>12</sup> The term "turnover" is used in accordance with the Delegated Act. This equals the definition of "sales" of the Fielmann Group.

For consistency reasons, we are using the official taxonomy wording.

<sup>13</sup> Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council.

statement of profit and loss and other income included in our annual report 2023. Details on revenue realisation are provided in the key accounting and valuation principles in our annual report.

As described in the previous section "Identification of Taxonomy-eligible economic activities", we did not identify any revenue from Taxonomy-eligible economic activities. Therefore, our share of Taxonomy-eligible turnover in total turnover for the financial year 2023 equals 0%.

### Capital expenditure

Proportion of Taxonomy-eligible CapEx: 
$$\frac{\text{Taxonomy-eligible CapEx}}{\text{Total CapEx}}$$

According to the Delegated Act on Article 8 of the EU Taxonomy Regulation, Taxonomy-aligned CapEx (numerator) is defined as follows:

- a) CapEx related to assets or processes that are associated with Taxonomy-aligned economic activities
- b) CapEx as part of an upgrade plan to expand Taxonomy-aligned economic activities or as part of an expansion plan to allow Taxonomy-eligible economic activities to become Taxonomy-aligned ("CapEx plan")
- c) CapEx related to the purchase of output from Taxonomy-aligned economic activities and individual measures enabling the target activities to become low-carbon or to lead to greenhouse gas reductions

On the basis of the reporting in 2023, the numerator is composed of Taxonomy-eligible CapEx.

Since we did not identify any Taxonomy-eligible economic activities in the section "Identification of Taxonomy-eligible economic activities", we do not have any CapEx of category a). Moreover, Fielmann currently has no plans to expand Taxonomy-eligible economic activities or to enable Taxonomy-eligible economic activities to become Taxonomy-aligned.

Investments in our optical devices are neither covered by Annex I or Annex II of the Climate Delegated Act nor by Annexes I to IV of the Environmental Delegated Act and therefore are Taxonomy-non-eligible as well.

Our Taxonomy-eligible CapEx of category c) is related to the economic activities

- 6.4 Operation of personal mobility devices, cycle logistics comprises:
  - acquisition or leasing of e-bikes for employees
- 6.5 Transport by motorbikes, passenger cars and light commercial vehicles comprise:
  - acquisition of company cars for employees
- 7.2 Renovation of existing buildings comprises:
  - painting work
  - dry construction work
  - carpentry work
  - flooring work
  - dismantling and replacement of ventilation systems
- 7.3 Installation, maintenance and repair of energy efficiency equipment, comprises:
  - replacement of windows with new windows
  - installation of light sources
  - installation of HVAC systems (heating, ventilation, and air conditioning)

- 7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings
  - installation and maintenance of charging stations for company owned electrical cars
- 7.5 Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings
  - installation and maintenance of energy measurement systems
- 7.6 Installation, maintenance and repair of renewable energy technologies
  - installation and maintenance of photovoltaic systems

Overall, for the accounting period 2023 Fielmann's share of:

- Taxonomy-eligible CapEx amounts to 5.2%
- Taxonomy-non-eligible CapEx represents 94.8%

The Delegated Act on Article 8 of the EU Taxonomy Regulation defines total CapEx (denominator) as "additions to tangible and intangible assets during the financial year considered before depreciation, amortisation and any re-measurements, including those resulting from revaluations and impairments, for the relevant financial year and excluding fair value changes." This also involves additions from business combinations. Total CapEx contains:

- All additions to Property, Plant and Equipment (IAS 16.73(e) (i) & (iii))
- Right-of-Use Assets (IFRS 16.53(h))
- Investment Property (IAS 40.79(d) (i), (ii))
- Intangible Assets (IAS 38(e) (i))

In our consolidated balance sheet of our annual report 2023, it comprises:

- Intangible assets (Note 1)
- Tangible assets (Note 3)
- Investment property (Note 3)
- Rights of use from leases (Note 4)

Total CapEx can be reconciled based on the Changes in consolidated fixed assets in our annual report 2023 (p. 92). Total CapEx represents the total of the movement types "Additions" and "Change to Consolidation scope" of the respective assets.

### Operating expenditure

$$\text{Proportion of Taxonomy-eligible OpEx: } \frac{\text{Taxonomy-eligible OpEx}}{\text{Total OpEx}}$$

In accordance with the Delegated Act on Article 8 of the EU Taxonomy Regulation, Taxonomy-aligned OpEx (numerator) is defined as follows:

- a) OpEx related to assets or processes that are associated with Taxonomy-aligned economic activities
- b) OpEx as part of an upgrade plan to expand Taxonomy-aligned economic activities or as part of an expansion plan to allow Taxonomy-eligible economic activities to become Taxonomy-aligned ("CapEx plan")
- c) OpEx related to the purchase of output from Taxonomy-aligned economic activities and individual measures enabling the target activities to become low-carbon or to lead to greenhouse gas reductions

With regards to the reporting in 2023, the numerator is composed of Taxonomy-eligible OpEx.

Pursuant to the Delegated Act on Article 8 of the EU Taxonomy Regulation, total OpEx (denominator) includes “direct non-capitalised costs that relate to research and development, building renovation measures, short-term lease, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment by the undertaking or a third party to whom activities are out-sourced that are necessary to ensure the continued and effective functioning of such assets.”

The non-capitalised amount resulting from leases was determined in accordance with IFRS 16. It comprises expenses for short-term leases, low-value leases and variable lease payments. Even though low-value leases and variable lease payments are not explicitly stated in the definition of OpEx according to the EU Taxonomy Regulation, we interpreted the legal specifications as to consider them.

With regards to the current financial period, our total operating expenditure amounts to € 48.8 million. OpEx is not material for our business model since our activities are not highly associated with fixed assets such as machinery. On this basis, our Taxonomy-eligible OpEx equals zero.

### **Identification of Taxonomy-aligned economic activities**

As mentioned above (Background information and reporting requirements) disclosures on Taxonomy-alignment are required since financial year 2022 onwards. This exercise has been carried out at Fielmann for the first time during 2022.

In compliance with the requirements of the EU taxonomy regulation, we have thoroughly reviewed our taxonomy eligible activities with regards to the substantial contribution to climate change mitigation and the compliance with the “do no significant harm” (DNSH) criteria. The company has considered information that was available until 31 January 2024.

In 2023, we have made further progress with regards to capturing the Fielmann Group level alignment with the minimum safeguards of Article 3 of the EU Taxonomy Regulation. These have been summarised at the top of this section (Background information and reporting requirements).

We have, as part of our due diligence process, considered the following areas:

1. Human rights: including labour and consumer rights
2. Corruption: Bribery, solicitation of bribes and extortion
3. Taxation
4. Fair competition

We have carried out a detailed analysis of Fielmann companies in which the Taxonomy-eligible economic activities were identified and have not found any indications of non-compliance with the standards mentioned.

### **Turnover (Sales Revenue)**

The EU Taxonomy states that non-financial undertakings should disclose the part of their net turnover that corresponds to their Taxonomy-eligible economic activities. It also indicates that sales revenues reported in an IFRS consolidated financial statement corresponds to turnover. This amounted to € 1,971.4 million for the fiscal year 2023. As assessed in the preceding fiscal year report, once again, we did not identify any revenue from Taxonomy-eligible economic activities. Therefore, our share of Taxonomy-eligible and aligned turnover in total turnover for the financial year 2023 equate to 0%.



### Fielmann – 2023 Key Performance Indicators for Turnover

Economic activities	Absolute turnover		Substantial contribution to climate change mitigation		Compliance with DNSH criteria	Compliance with minimum safe-guards	Taxonomy aligned turnover	
	in mill. €	in %	in mill. €	in %	Y/N	Y/N	in mill. €	2022
	1,971.4							
A. Taxonomy-eligible activities	0	0	0	0	N.A.	J	0	0
B. Taxonomy-non-eligible activities	1,971.4							
<b>Total (A + B)</b>	<b>1,971.4</b>	<b>100</b>						

### Capital Expenditures

These amounted to € 405.710 million for the fiscal year 2023.

In 2023, total capital expenses that were estimated to meet the EU Taxonomy definition of Substantial Contribution represent less than 1% of the total consolidated capital expenses of the Fielmann Group. As a result of our review process for fiscal year 2023, the total capital expenses that can be considered to meet the EU Taxonomy definition of Taxonomy-aligned were recognized at 0%.

### Fielmann – 2023 Key Performance Indicators for CapEx

Economic activities	Absolute CapEx		Substantial contribution to climate change mitigation		Compliance with DNSH criteria	Compliance with minimum safe-guards	Taxonomy-aligned CapEx	
	in mill. €	in %	in mill. €	in %	Y/N	Y/N	in mill. €	2022
<b>A. Taxonomy-eligible activities</b>	<b>20.970</b>	<b>5.2</b>			<b>N</b>	<b>Y</b>	<b>0</b>	<b>0</b>
6.4 Operation of personal mobility devices, cycle logistics	0	0	0	0	N	Y	0	0
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	1.776	0.4	0.258	0.1	N	Y	0	0
7.2 Renovation of existing buildings	8.958	2.2	0.066	0.02	N	Y	0	0
7.3 Installation, maintenance and repair of energy efficiency equipment	10.049	2.5	2.009	0.5	N	Y	0	0
7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings	0	0	0	0	N	Y	0	0
7.5 Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	0.148	0.04	0	0	N	Y	0	0
7.6 Installation, maintenance and repair of renewable energy technologies	0.039	0.01	0	0	N	Y	0	0
<b>B. Taxonomy-non-eligible activities</b>	<b>384.740</b>	<b>94.8</b>						
<b>Total (A + B)</b>	<b>405.710</b>	<b>100</b>						

### Operating Expenditures

The total OpEx amounted to € 48.8 million for the fiscal year 2023.

As identified in the preceding fiscal year report and mentioned above, OpEx is not material for our business model since our activities are not highly associated with fixed assets such as machinery. On this basis, our Taxonomy-eligible and aligned OpEx equate to zero.

### Fielmann – 2023 Key Performance Indicators for OpEx

Economic activities	Absolute OpEx		Substantial contribution to climate change mitigation		Compliance with DNSH criteria	Compliance with minimum safeguards	Taxonomy aligned OpEx	
	in mill. €	in %	in mill. €	in %	Y/N	Y/N	in mill. €	2022
<b>A. Taxonomy-eligible activities</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>N.A.</b>	<b>Y</b>	<b>0</b>	<b>0</b>
6.4 Operation of personal mobility devices, cycle logistics	0	0	0	0	N.A.	Y	0	0
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	0	0	0	0	N.A.	Y	0	0
7.2 Renovation of existing buildings	0	0	0	0	N.A.	Y	0	0
7.3 Installation, maintenance and repair of energy efficiency equipment	0	0	0	0	N.A.	Y	0	0
7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings	0	0	0	0	N.A.	Y	0	0
7.5 Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	0	0	0	0	N.A.	Y	0	0
7.6 Installation, maintenance and repair of renewable energy technologies	0	0	0	0	N.A.	Y	0	0
<b>B. Taxonomy-non-eligible activities</b>	<b>48.831</b>	<b>100</b>						
<b>Total (A + B)</b>	<b>48.831</b>	<b>100</b>						

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2-3	Reporting period, frequency and contact point	This report is published annually. This report was published in April 2024 and contains the reporting period from 1 January 2023 to 31 December 2023. Frequency, reporting period and reporting date are aligned with the financial reporting. Contact: <a href="mailto:csr@fielmann.com">csr@fielmann.com</a>
2-4	Restatements of information	In this report, we have made no significant changes compared to the previous year.
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3-1	Process to determine material topics	p. 12 f.
3-2	List of material topics	pp. 13, 67 f.
3-3	Management of material topics	pp. 16 f., 21 ff., 26 ff., 34 ff., 38, 41 ff., 45 f., 49 ff.

#### GRI 201: Economic Performance 2016

201-4	Financial assistance received from government	p. 17
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#### GRI 203: Indirect Economic Impacts 2016

203-1	Infrastructure investments and services supported	p. 44
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#### GRI 205: Anti-corruption 2016

205-1	Operations assessed for risks related to corruption	p. 17
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#### GRI 302: Energy 2016

302-1	Energy consumption within the organisation	pp. 53 f.
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#### GRI 305: Emissions 2016

305-1	Direct (Scope 1) GHG emissions	p. 55 f.
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#### GRI 401: Employment 2016

401-1	New employee hires and employee turnover	Fielmann reports its own key indicators for the "Employment" topic and does not orientate itself to the GRI standard in this case.
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#### GRI 403: Occupational Health and Safety 2018

403-9	Work-related injuries	p. 39
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#### GRI 404: Training and Education 2016

404-1	Average hours of training per year per employee	p. 37
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#### GRI 414: Supplier Social Assessment 2016

414-1	New suppliers that were screened using social criteria	p. 47
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#### GRI 416: Customer Health and Safety 2016

416-1	Assessment of the health and safety impacts of product and service categories	p. 29
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#### GRI 418: Customer Privacy 2016

418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	p. 25
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## About this report

### Corporate social responsibility

As a family-run company and market leader, the Fielmann Group assumes responsibility for the society we live in and also works hard for the good of nature and people. We are convinced that a company can only enjoy long-term success in an intact, well-balanced social environment.

In this report, we give particular regard to customer matters, environmental matters, employee-related matters, social matters, respect for human rights, anti-corruption and bribery matters. We thereby offer a transparent and comprehensive view on the social and ecological consequences of our actions and present our activities in the field of corporate social responsibility (CSR).

Unless otherwise stated, all the information in the report refers to the financial year 2023 (calendar year 2023). This report complements the information provided in the Fielmann Group AG Management Report and the Group Management Report of the Fielmann Group contained in the Annual Report with significant developments in non-financial matters. Unless any other frame of reference is stated, the report includes all companies of the Fielmann Group.

The content of this report was approved by the Supervisory Board of Fielmann Group AG pursuant to Section 171 Para. 1 of the German Stock Corporation Act (AktG). This non-financial report was not subject to an external audit.

GRI 2-2 GRI 2-5

### Requirements pursuant to Section 289c of the HGB and the Global Reporting Initiative (GRI)

This report represents the non-financial declaration of Fielmann Group AG pursuant to Section 289b Para. 3 of the HGB and of the Fielmann Group pursuant to Section 315b Para. 3 of the HGB. The Fielmann Group thereby complies with the provisions formulated by the CSR Directive Implementation Act set out in Sections 289b and 315b of the HGB. The report was compiled following the GRI standards of the Global Reporting Initiative (GRI) as a guideline. The non-financial topics relevant to the Fielmann Group were determined as part of a materiality analysis, which is based on the criteria of the GRI and updated annually by the Management Board. To comply with the requirement of double materiality pursuant to Sections 289c Para. 3 (1) and 315c of the HGB, the Management Board also defined the significance of the respective topics for the situation and business developments of Fielmann Group AG and the Fielmann Group during the process. The defined material topics and the materiality analysis process are set out in detail on pages 12 et seq. of this report. The Management Board has checked and validated the result of the materiality analysis for the financial year 2023.

<b>Section 289c of the HGB</b>	<b>GRI</b>	<b>Fielmann Group Corporate Social Responsibility Report</b>
Environmental matters (Section 289c Para. 2 (1) of the HGB)	<ul style="list-style-type: none"> <li>– Energy (302)</li> <li>– Emissions (305)</li> </ul>	Responsibility for our environment
Employee matters (Section 289c Para. 2 (2) of the HGB)	<ul style="list-style-type: none"> <li>– Employment (401)</li> <li>– Occupational health and safety (403)</li> <li>– Training and education (404)</li> </ul>	Responsibility for our employees
Social matters (Section 289c Para. 2 (3) of the HGB)	<ul style="list-style-type: none"> <li>– Customer health and safety (416)</li> <li>– Customer privacy (418)</li> </ul>	Responsibility for our customers
Respect for human rights (Section 289c Para. 2 (4) of the HGB)	<ul style="list-style-type: none"> <li>– Supplier social assessment (414)</li> </ul>	Responsibility for our society
Anti-corruption and bribery matters (Section 289c Para. 2 (5) of the HGB)	<ul style="list-style-type: none"> <li>– Anti-corruption (205)</li> </ul>	Sustainable corporate governance

#### GRI 3-2

The Fielmann Group reports on the following aspects pursuant to Section 289c Para. 2 of the HGB: environmental matters (Section 289c Para. 2 (1) of the HGB), employee matters (Section 289c Para. 2 (2) of the HGB), social matters (Section 289c Para. 2 (3) of the HGB), respect for human rights (Section 289c Para. 2 (4) of the HGB) and anti-corruption and bribery matters (Section 289c Para. 2 (5) of the HGB).

Pursuant to GRI requirements, the Fielmann Group reports on the aspects of Energy (302) and Emissions (305) in the “Responsibility for our environment” chapter, Employment (401), Training and education (404) and Occupational health and safety (403) in the “Responsibility for our employees” chapter, and Customer health and safety (416) and Customer privacy (418) in the “Responsibility for our customers” chapter. Supplier social assessment (414) is covered in the “Responsibility for our society” chapter, and Anti-corruption (205) in the “Sustainable corporate governance” chapter.

The Fielmann Group also reports on a voluntary basis – beyond the requirements of Section 289c Para. 2 of the HGB – on the GRI aspects Economic performance (201) and Indirect economic impacts (203).

Pursuant to Section 289c Para. 3 of the HGB, the Fielmann Group presents in detail the objectives, concepts, measures (Section 289c Para. 3 (1) of the HGB) and results (Section 289c Para. 3 (2) of the HGB) of every aspect in the financial year. This presentation is supplemented by relevant non-financial performance indicators (Section 289c Para. 3 (5) of the HGB). The Fielmann Group provides details on significant risks in the “Sustainable corporate governance” chapter on page 6 et seq. (Section 289c Para. 3 (3) and (4) of the HGB). Readers familiar with the GRI standards are referred to the relevant GRI indicators using identifications like GRI [2-23](#). An overview of the GRI indicators is available in the GRI contents index on page 65 et seq.

### Structure of the report

The Fielmann Group’s Corporate Social Responsibility Report is divided into five main chapters, preceded by this overview and the contents page:

- Sustainable corporate governance
- Responsibility for our customers
- Responsibility for our employees
- Responsibility for our society
- Responsibility for our environment

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**We help *everyone*  
hear and see  
the beauty in the world.**

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