



Human rights policy

Human rights statement

TOP-TOY wishes to play a responsible role in the communities where we operate and towards the people we affect. Therefore, in accordance with the UN Guiding Principles we recognise our role as a business to respect human rights in all our operations.

Our approach to human rights follows the Universal Declaration of Human Rights and its two corresponding covenants – the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights. The UN Convention on the Rights of the Child is also central to our policy.

In our own operations and value chain, the following play a central role: the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work; the OECD Guidelines for Multinational Enterprises; the Children's Rights and Business Principles and the United Nations' Global Compact.

We are fully aware that we operate in a global context, where we face cultural differences and are often dependent on other companies' commitment to respect human rights – and not least on governments' duty to protect human rights. For this reason, we need to work at various levels, whether individual, industry or at the level of civil society at large, e.g. Non-Governmental Organisations (NGOs), Inter-Governmental Organisations (IGOs), businesses, and government. Our goal is to use our resources where they have the greatest impact.

Our commitment

As a company that works with toys and products for children, it is only natural that we approach human rights from a child right's perspective. Our ambition is to be a child-friendly company. To this end, we aim to respect, support and promote children's rights in line with the Children's Rights and Business Principles in all our operations and our sphere of influence.

This requires us to consider the best interests of the child at all times, regardless of whether we are in direct contact with children or whether our impact is channelled indirectly through parents, caregivers, family members, friends and communities. This also requires us to consult children on matters of importance to them, if appropriate.

Our priority areas

To ensure we focus on the right issues and that we use our influence to greatest effect, we will conduct regular human rights (including children's rights) assessments. Our objective is to identify the measures we must take to mitigate any adverse impact on human rights.

Our priority areas are:

- **Safe and fun products**
Every child has a right to safe play. We will work continuously to ensure our products and services are child-friendly and safe.
- **Our colleagues**
The people working at TOP-TOY are the key to our success. We wish to be an equal opportunities employer and strive to create a working environment that is engaging, respectful and free from discrimination.
- **Respectful marketing**
Our marketing activities should be fun, non-discriminatory and gender-neutral. At the same time, marketing messages should be clear and accurate and empower parents and children to make informed decisions.
- **Employment conditions in our value chain**
We will continuously evaluate labour conditions in our value chain. It is important that we have a positive influence on younger workers and migrant workers. Clear remedial processes are in place in the event that we find evidence of child labour

Access to remedy and request for further information

We take active steps to conduct human rights due diligence and to identify and mitigate actual or potential adverse impacts on human rights. We value open and honest communication and any feedback and information that our internal or external partners provide, both for our need to improve our respect of but also our potential to support human and children's rights.

Employees who feel their human rights are compromised or who wish to raise a concern should use the escalation ladder defined in our Code of Conduct.

External parties who either wish to raise a concern or lodge a complaint can do so by:

- Using our customer service channels
- Sending an e-mail to com@top-toy.com

Employees working in factories that hold an ICTI Seal of Compliance are encouraged to use the ICTI Care hotline.

Scope

This policy applies to all TOP-TOY employees, including employees working on short-term contracts or part-time. It requires that all undergo basic human rights training, as our employees are our human rights ambassadors. Necessary training will also be given to various business partners as deemed necessary. All governing TOP-TOY documents will be regularly updated in line with the policy.



The Communications & Sustainability team will review and, if required, update the policy at regular intervals.

Reporting and communication

We will communicate the progress of our work on our human rights priority areas and the implementation of this policy in our annual performance report.