

## NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

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### 1. PURPOSE

To provide an inclusive workplace, free of discrimination and harassment, including sexual harassment; To support the productivity, personal goals, dignity and self respect of HUGO BOSS, its employees and potential employees, and to promote sensitivity to individual differences. As always, employees are expected to adhere to generally accepted standards of business conduct.

### 2. EFFECTIVE DATE

This policy was revised on October 1, 2018.

### 3. SCOPE & APPLICABILITY

This policy applies to all HUGO BOSS Canada applicants and employees, whether related to conduct engaged in by fellow employees or by someone not directly connected to HUGO BOSS Canada (e.g., an outside vendor, consultant, applicant, customer). Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings, and business-related social events.

### 4. DEFINITIONS

4.1. Discrimination: Discrimination constitutes denying an individual employment, or goods and services, based on a prohibited ground; or differentiating adversely between individuals in the course of employment, or in the provision of goods and services, based on a prohibited ground as defined in applicable human rights legislation.

4.1.1. Prohibited grounds include, but are not limited to, age, race, colour, religion, national or ethnic origin, sex (including pregnancy), family status, marital status, sexual orientation, and mental or physical disability.

4.2. Discriminatory Harassment: Discriminatory harassment constitutes any course of vexatious conduct or comment, based on any of the prohibited grounds, listed above, that is likely to cause offence or humiliation to any employee or customer, or might reasonably be perceived as placing a condition on employment, employment opportunities (e.g. training, promotion) or the provision of goods and services.

Discriminatory harassment will have taken place if it is known or ought to have reasonably been known that the behavior in question was unwelcome or inappropriate in the workplace. Examples of inappropriate behavior include unwelcome remarks, jokes or taunts about an individual's racial background, colour, place of birth, citizenship or ancestry (or other prohibited ground); display of derogatory, racist or offensive pictures or material; or the refusal to work with an individual on the basis of his or her racial background (or other prohibited ground).

4.3. Sexual Harassment: Sexual Harassment, is any conduct, comment, gesture or contact of a sexual nature that is likely to cause offence or humiliation to any employee; or that

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might, on reasonable grounds, be perceived by an employee as placing a condition of a sexual nature on employment or on any opportunity for training or promotion.”

Sexual harassment, which is a specific form of discriminatory harassment, is generally comprised of objectionable and offensive behavior that may occur once or repeatedly. Examples of sexual harassment include unwelcome advances, flirtations, jokes or propositions of a sexual nature; unwanted requests for sexual favours by a person in a position to confer, grant or deny a benefit or advancement; sexually degrading words, images or other material; conduct of a sexual nature, including leering, pinching, touching and patting.

## **5. POLICY STATEMENT**

HUGO BOSS Canada will make every reasonable effort to ensure that no employee is subjected to discrimination and harassment in the workplace. In particular, HUGO BOSS Canada accepts responsibility to ensure that its policies, practices, work arrangements and facilities do not have unlawful discriminatory effects on those individuals protected under applicable human rights legislation.

Further, HUGO BOSS Canada will not tolerate any behavior, including from independent contractors and other individuals with whom HUGO BOSS Canada does business, which conflicts with the spirit or intent of human rights laws that are applicable to HUGO BOSS Canada’s operations within or outside of Canada.

## **6. REPORTING AN INCIDENT OF HARASSMENT, DISCRIMINATION OR RETALIATION**

HUGO BOSS encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Employees who believe they have been the victims of conduct prohibited by this policy statement or believe they have witnessed such conduct should discuss their concerns with their Manager and/or contact the Human Resources Department. Refer to the HUGO BOSS Equal Employment Opportunity Complaint Procedure.

## **7. POLICY OWNERSHIP**

This policy is owned by HUGO BOSS Human Resources Department.

## **8. POLICY CHANGES AND INTERPRETATIONS**

This policy may only be changed by Human Resources. Questions regarding interpretation and clarification should be directed to your Manager.

## **9. POLICY ENFORCEMENT**

HUGO BOSS considers all forms of discrimination, including discriminatory and sexual harassment, to be unacceptable. HUGO BOSS management will not tolerate its occurrence; and will make every reasonable effort to ensure that no employee is subjected to it. Employees will be held accountable for ensuring that their behavior is in keeping with this policy.

## **10. RELATED POLICIES** See also: Workplace Violence and Harassment Policy