

Compliance

**HUGO BOSS
Supplier Code
of Conduct**

PREAMBLE

The HUGO BOSS Supplier Code of Conduct establishes general standards that apply in particular to respecting and complying with ethical business practices, to human rights, labor and social standards, and to environmental protection issues. The requirements are based on the Universal Declaration of Human Rights of the United Nations (UN), the UN Guiding Principles on Business and Human Rights, the Fundamental Conventions of the International Labour Organization (ILO) and the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD). Furthermore, the principles of the Fashion Industry Charter for Climate Action of the United Nations Framework Convention on Climate Change (UNFCCC) are also applicable. These specifications are understood as establishing the fundamental rights and obligations for all suppliers of HUGO BOSS and its employees. Suppliers are obligated to inform their employees of their rights and obligations under the requirements formulated by HUGO BOSS, as well as under applicable national law, in an appropriate manner.

The HUGO BOSS Supplier Code of Conduct serves as a foundation for the compliance standards which HUGO BOSS's suppliers and the company's own production sides are expected to observe. The requirements formulated by HUGO BOSS should be considered a minimum standard which, in the opinion of HUGO BOSS, are intended to compensate for any insufficient legal conditions which exist in countries from which our products are purchased. **If the statutory provisions of a country pursue the same objective as the standards defined by HUGO BOSS, then the regulations which provide better protection to the interests of employees and to the environment shall apply.** HUGO BOSS reserves the right to regularly review compliance with the requirements and to adapt them as necessary. HUGO BOSS is entitled to determine the manner in which compliance will be reviewed in each individual case. HUGO BOSS expects that all suppliers will inform their own sub-suppliers of the specifications of the HUGO BOSS Supplier Code of Conduct and will conduct regular reviews to ensure they comply with the defined standards. Any concrete indication of violations of defined standards within the supply chain must be reported to HUGO BOSS as quickly as possible.

If a supplier fails to comply with the defined standards, HUGO BOSS reserves the right to enact sanctions in consideration of all circumstances in the individual case and of the severity of the violation. All requirements should be considered fundamental contractual components for the business relationship. In case of repeated violations, HUGO BOSS reserves the right to end the business relationship.

1 COMPLIANCE WITH LAWS AND ETHICAL BUSINESS PRACTICES

HUGO BOSS expects that all of its suppliers will comply with applicable national laws and international standards. Any form of fraud, corruption, and granting improper advantages is prohibited. Business-related decisions must be made on an objective basis and may not be impacted by subjective interests. Furthermore, HUGO BOSS expects that all suppliers, their shareholders, and managers will comply with applicable antitrust, money laundering, sanction, and tax regulations, and that they will obligate their own sub-suppliers accordingly. In addition, HUGO BOSS expects that suppliers will be sufficiently familiar with their own supply chains so that they can identify any violations as quickly as possible, if there are concrete indications present that such violations exist. Suppliers are additionally obligated to protect the information, data, and trade secrets provided to them under all circumstances, and to promptly return or delete this information after the end of the supplier relationship.

2 HUMAN RIGHTS & LABOR STANDARDS

Respecting human rights and basic freedoms are a top priority for HUGO BOSS. All suppliers are expected to observe internationally recognized human rights in relation to all business activities within their own sphere of influence. HUGO BOSS will not tolerate any violations. Suppliers are obligated to establish a confidential or anonymous complaint mechanism in order to allow employees to report violations. Furthermore, employees of all suppliers along the supply chain are entitled to use the free and independent whistleblower channel provided by HUGO BOSS (see attachment). All suppliers must inform their employees in a suitable manner that they are entitled to use the system. In addition, HUGO BOSS obligates its suppliers to comply with the Human Rights Policy, the current valid version of which is available on the corporate website.

2.1 CHILD LABOR

HUGO BOSS strictly rejects all forms of child labor. Therefore, suppliers are stringently prohibited from using child labor. The definition of child labor is based on the globally recognized standards of the ILO. According to the ILO the minimum age for beginning employment is 15 or the legal minimum age defined by the country when it is higher than 15. In general, however, children may not be employed before the end of their obligatory schooling requirements. Whichever of these regulations provides broader protection will apply. If an employee begins work before they turn 18, then certain specifications must be fulfilled to protect young workers. These are based on

international standards and are summarized in the relevant HUGO BOSS Guidelines on Child Labor and Forced Labor.

2.2 INDIGENOUS PEOPLES AND LOCAL COMMUNITIES

Indigenous peoples have a special connection to a certain region or territory, as well as the natural resources located there. HUGO BOSS recognizes that it has a responsibility to respect and protect the traditional rights that indigenous peoples and local communities have to the land and to natural resources (for example access to clean water) which are affected by, or which could be affected by, the company's business activities, and it expects its suppliers to recognize those same responsibilities. Processes and standards are developed to protect the traditional lifestyles of indigenous peoples and local communities, and to promote their involvement in decision-making processes.

2.3 WORK FROM HOME

The ILO defines work from home as any work that a person does in their home or at another location of their choice, except for at the employer's business premises. This work is performed for a fee, and results in a product or service specified by the employer. Work from home may be advantageous in certain situations, for instance if an individual is not able to perform other work due to their family obligations. HUGO BOSS permits its suppliers to use work from home for certain parts of the production process. Compliance with employee rights must be ensured if work from home is used. If work from home is used by a supplier's sub-suppliers, then suppliers are required to inform HUGO BOSS of the scope and duration of such work. Furthermore, work from home requires additional documentation and regular checks on working hours. Documentation can be asked by HUGO BOSS during the social compliance checks.

2.4 FORCED LABOR AND MODERN SLAVERY

HUGO BOSS has a zero-tolerance policy against forced labor, human trafficking, and modern slavery. Suppliers may never employ forced laborers, bondsmen, slaves, prisoners, or other workers who are not free under any circumstances. All employees must be granted the right to leave their work site and the company grounds. If the supplier provides facilities such as lodgings, then employees who utilize such facilities must be ensured freedom of movement at all times. All employees of HUGO BOSS suppliers must be free to choose the type of employment they engage in, and to resign from such employment at any time in compliance with statutory and reasonable notice periods. Restrictions of employees' freedom of movement are never permitted.

Retention of a deposit or of ID documents or similar documents by the employer is not permitted.

2.5 THIRD-PARTY RECRUITMENT

If a third party is commissioned to recruit employees, then the supplier is obligated to review its practices to ensure they conform to the HUGO BOSS Supplier Code of Conduct. Costs for commissioning a third party may never be passed on to employees. In particular, the practice of hiring migrant workers through a third party requires an increased level of caution and an additional review of processes by the supplier. It must always be ensured that the conditions of employment are communicated in a transparent and comprehensible manner, and that migrant workers are aware of their rights. Upon request by HUGO BOSS, information on the commissioned third party must be provided.

2.6 DISCRIMINATION

Equal opportunity and equal treatment must be ensured for all employees throughout hiring, compensation, advancement, discipline, termination, retirement, and the entire employment relationship. Any form of discrimination based on age, health, gender or gender expression, skin color, sexual orientation, intellectual or physical disability, origin, nationality, race or ethnicity, social group, religion or worldview, political opinion, membership in a union or other personal characteristics is prohibited. Suppliers must actively work to prevent and eliminate discrimination.

The risk of people from vulnerable groups are particularly high, to become a victim of discriminatory behaviour, due to their disproportionate representation in the textile industry. Therefore, the rights of children, young workers, women, migrant workers, indigenous peoples, agency workers, homeworkers and temporary workers are specially at risk.

In its own business activities, HUGO BOSS takes a dedicated approach to protecting these groups, and it expects that its suppliers will protect their rights as well.

2.7 HARASSMENT AND SEXUAL HARASSMENT

Harassment can range from extreme forms such as violence, threats, or physical contact to less obvious actions like ridiculing, teasing or bothering colleagues or subordinates, or refusing to talk to them. It may also involve verbal or physical conduct including comments, actions or gestures that affect a colleague's dignity or psychological or physical integrity.

Sexual harassment is a particularly serious form of harassment. Sexual harassment is defined as unwanted conduct of a sexual nature, verbal or physical advances, or sexually derogatory / discriminatory statements or acts.

We want to particularly highlight the problem of gender-based violence, primarily against women and sexual minorities. HUGO BOSS does not tolerate any such incidents and expects that its suppliers will implement preventative measures to protect these individuals. In addition, suitable guidelines, processes, and training measures should be created for employees and managers.

2.8 HUMANE WORKING CONDITIONS

The inherent worth, privacy, and personal rights of employees must always be respected. Physical, mental, sexual, or verbal abuse, and punishments, assaults, or intimidation are prohibited. Especially when using private or public security forces, it must be ensured that the rights of the workers are not endangered. The supplier shall ensure this through comprehensible instruction or appropriate supervision.

Disciplinary measures are permitted only within the framework of the law or provisions established by HUGO BOSS and must always be appropriate for the specific case.

2.9 FAIR COMPENSATION

Employees have the right to fair compensation which is sufficient to cover their own basic needs and those of their family, earned during a regular work week. For HUGO BOSS, this means that the monetary means available must be sufficient to ensure the basic needs of food, water, housing, education, health care, transport and clothing for all members of the household. Moreover, employees should have disposable income to build up reserves for unexpected events. In addition, employees must be informed in writing of the agreed conditions, in the form of an employment contract and payroll statement. Suppliers are obligated to pay at least the statutory minimum wage, or a wage corresponding to the industry standard if this would be higher. If it is not possible for the supplier to pay a higher wage corresponding to the industry standard, then HUGO BOSS must be notified of this promptly, with justifications. It is expected that suppliers will work in cooperation with HUGO BOSS to progressively achieve a level of fair compensation. The aim is to ensure that all employees receive a fair compensation, regardless of their gender or other diversity dimensions. Furthermore, HUGO BOSS expects that all suppliers will comply with national specifications governing health and social insurance.

In addition, all statutory and any other applicable requirements (such as collective bargaining agreements) for special benefits must be observed. Overtime hours must be compensated with additional pay. Where statutory law allows for employees to be compensated for overtime work with time off, this arrangement must be done with the employee's consent. Employees who become pregnant during their employment must receive all legally required benefits and protections. Suppliers are prohibited from using salary deductions as a disciplinary measure. If there are national laws that

prohibit an employee from being released for non-operational reasons unless monetary disciplinary measures have first been taken against that employee, then all measures may only be carried out in consideration of the actual objective facts of the specific case. The supplier must document the process steps.

2.10 WORK HOURS

Applicable national work hours regulations, including applicable break time, holiday, and vacation provisions, must be complied with. If there are no national regulations, or if these do not meet the standards of the ILO, then the regular working hours may not exceed 48 hours. Including permitted overtime hours, total work hours within a week may not exceed 60 hours. Overtime hours are permitted only if employees agree to the additional work, or if overtime hours are regulated by the law or applicable collective bargaining agreements and must be compensated accordingly. To track the working hours of an employee, suppliers have to implement a working time recording system which records the start and end time of a work day for each employee. This can be established either electronically or manually. In case of manually systems, the employees have to confirm the recorded working hours at least once a month. An employee who is seven months pregnant or more may not work overtime hours nor work on the night shift, regardless of whether this is permitted under local law or not. After six workdays in a row, employees must be granted a break of at least 24 hours. Furthermore, employees are entitled to statutory minimum vacation time.

2.11 OCCUPATIONAL HEALTH AND SAFETY

The supplier must ensure the physical and mental health and safety of its employees in the course of their work and must take suitable preventative measures against accidents and occupational illnesses. In particular, lighting must be sufficient during all work hours when employees are performing work, and noise emission levels must be appropriate. Sufficient sanitary facilities must be made available, and facilities must be clean and separated by gender. Employees must have access to sanitary facilities during work hours, without unreasonable restrictions. The supplier must ensure that systems have been established to define, evaluate, avoid, and counteract potential hazards that could affect the health and safety of employees. The requirements listed here also apply to all other facilities, such as lodgings, which the supplier provides to employees.

Suppliers need to document high-risk activities that may expose workers to hazards or result in serious injuries or fatality and apply necessary controls. They should ensure that plants, installations, technical equipment including safety devices, and personal

protective equipment are regularly inspected, properly maintained and, if necessary, replaced. Where Personal Protective Equipment ("PPE") is required to be used to minimize exposure to hazards, PPE shall be provided by Supplier at no cost to employees.

Pregnant workers should be granted special protection. They should not be assigned to high-risk activities and must be granted regular breaks.

2.12 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

All employees have the right to freedom of association and collective bargaining. Employees must be granted the right to found organizations of their choice for the purpose of safeguarding employee rights, or to join employee organizations. Employees must be free to negotiate regarding working conditions, in particular wages. Suppliers must recognize and respect the right of freedom of association and collective bargaining and not discriminate against, harass, intimidate, terminate, or otherwise disadvantage employees who take advantage of these rights.

3 ENVIRONMENTAL ASPECTS

HUGO BOSS expects that its suppliers will work on an ongoing basis to reduce the environmental impacts associated with their business activities. The environmental protection laws and provisions of the country in which production is carried out must be complied with as a minimum standard. Natural resources must be used in the most efficient and sustainable manner possible. The protection of people, animals, and the environment takes precedence. For this reason, suppliers are required to establish an environmental management system that establishes clear goals to increase their environmental responsibility.

3.1 ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSIONS

Suppliers are required to identify and monitor all relevant energy sources and greenhouse gas emissions. They need to establish a roadmap for reducing their energy consumption and emissions. HUGO BOSS expects that its suppliers will agree to continuously promote energy efficiency measures and the use of renewable energy.

3.2 WATER CONSUMPTION

Suppliers must monitor and document their water consumption and optimize it using appropriate strategies. The quantity of water taken from surface or groundwater sources must conform at least to national or local requirements. Suppliers with production processes that use water intensively, in particular, are required to continuously monitor and report their water usage.

3.3 CHEMICAL AND WASTEWATER MANAGEMENT

If production processes require the use of chemicals or other materials that could be hazardous to people, animals, or the environment, then suppliers must ensure that a hazardous materials management system is established to regulate their use, storage, and transportation. National regulations must be complied with. If there are alternative materials that would be less harmful to the environment and to human and animal health, then suppliers are required to use these. When suppliers use chemicals, they must monitor their chemical inventory and wastewater streams to identify and prevent contamination. They must do so in accordance with applicable legal requirements, and not use any prohibited substances¹. Controls must be carried out on a regular basis.

3.4 WASTE MANAGEMENT

HUGO BOSS expects its suppliers to continuously minimize waste and to dispose of any waste produced in accordance with local statutory specifications and international conventions².

3.5 OTHER ENVIRONMENTAL ASPECTS

In addition to the environmental aspects set forth in detail above, there may be other applicable national or local provisions on airborne emissions, land usage, protection of biodiversity, noise, odor emissions, and other environmental aspects that apply, depending on the partner's location and specific production processes.

4 COLLABORATION WITH NON-GOVERNMENTAL ORGANIZATIONS

HUGO BOSS cooperates with a variety of non-governmental organizations to improve social and environmental conditions in relation to its collaboration with suppliers. Within the framework of such partnerships, HUGO BOSS reserves the right to transfer its initially asserted rights to any reviews (such as audits) to these partner organizations.

5 FINAL PROVISIONS

HUGO BOSS expects that its suppliers will comply with the standards established here, which HUGO BOSS itself observes, and requires that its partners support their implementation as much as possible through suitable measures such as management systems, guidelines, training sessions, and process specifications. All of the supplier's

¹ In accordance with the Stockholm Convention, substances listed in the POP regulation must not be used. In addition, all requirements in terms of chemicals must comply to all relevant annexes of REACH (Regulation (EC) 1907/2006)

² For example the Basel Convention covers hazardous waste and must be respected.

employees must be trained appropriately on the topics addressed here, on a regular basis. Furthermore, suppliers are obligated to forward these specifications to their own preliminary suppliers and partners, and to conduct suitable reviews to ensure they are complied with. HUGO BOSS reserves the right to regularly review the Supplier Code of Conduct (at least once annually) with the involvement of relevant interest groups, to adapt the code as needed, and to communicate any changes to suppliers.

ATTACHMENT:

INFORMATION ON USING THE HUGO BOSS WHISTLEBLOWER CHANNELS

Employees of HUGO BOSS, its own partners and suppliers, as well as customers of the company and other third parties are entitled to contact HUGO BOSS directly or the HUGO BOSS Ombudsperson in case of any questions or complaints regarding social standards, working conditions, or human rights.

The HUGO BOSS Speak Up Channel offers confidential and anonymous communication with the HUGO BOSS Compliance Department. HUGO BOSS The channel is available in over 50 languages at the following link:

[HUGO BOSS Speak up Channel](#)

Or via the following QR-Code:



Likewise, as an equivalent option which provides the possibility of personal contact, the HUGO BOSS Ombudsperson is available as a contact person for any tips regarding illegal business practices, violations of human rights, or violations of the HUGO BOSS Supplier Code of Conduct.

The HUGO BOSS Ombudsperson is available by contacting:

Dr. Carsten Thiel von Herff
External attorney
International number: 00800 6628376266
Cell: + 49 151 58 23 03 21
Email: ombudsmann@thielvonherff.com
<https://report-tvh.com/>
Thiel von Herff Attorneys
Loebellstrasse 4
33602 Bielefeld
Germany

All tips will be treated as strictly confidential. The identity of the whistleblower and all individuals named in the tip will be disclosed only to individuals who are responsible for receiving tips or for taking follow-up measures unless statutory exceptions apply.

All reprisals against whistleblowers are prohibited. This also applies to threats or attempts to implement punitive measures.

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Policy Owner:	Compliance	Classification:	public