

Compliance

**HUGO BOSS
Supplier Code of Conduct
– Indirect Procurement**

PREAMBLE

The following Supplier Code of Conduct (following Code) only applies to suppliers and partners (following suppliers) of indirect procurement and non-production materials.

This Code establishes general standards that apply in particular to respecting and complying with national and international legal requirements and ethical business practices. In addition, all suppliers must respect human rights, social standards and environmental standards at any time. 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 Code serves as a foundation for the compliance standards which HUGO BOSS's suppliers are expected to observe. **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. In cases where the Code conflicts with national law, national law shall prevail.** HUGO BOSS reserves the right to regularly check compliance with the requirements and adjust them if necessary. HUGO BOSS expects that all suppliers will inform their own sub-suppliers of the specifications of the Code and will conduct regular reviews to ensure they comply with the defined standards. Any concrete and serious indication of violations of defined standards within the supply chain must be reported to HUGO BOSS as quickly as possible. Human rights violations must always be reported.

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. 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. 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

All suppliers are expected to observe internationally recognized human rights¹ 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 or inform their employees about the free and independent whistleblower channels provided by HUGO BOSS.

2.1 CHILD LABOR

Suppliers are stringently prohibited from using child labor. 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.

2.2 FORCED LABOR AND MODERN SLAVERY

Under no circumstances may suppliers employ forced labor or other workers who are not free. All employees must be granted the right to leave their work site and the company grounds. 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. Retention of a deposit or of ID documents or similar documents by the employer is not permitted.

2.3 DISCRIMINATION AND HARASSMENT

Equal opportunity and equal treatment must be ensured for all employees throughout the recruiting process and the entire employment relationship. Any form of discrimination based on age, health, gender or gender expression, skin color, sexual

¹ By this we mean the national recognized regulations from the following conventions: 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), the principles of the Fashion Industry Charter for Climate Action of the United Nations Framework Convention on Climate Change (UNFCCC)

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.

Furthermore, HUGO BOSS does not tolerate any form of harassment and sexual harassment and expects that its suppliers will implement preventative measures to protect individuals.

2.4 FAIR COMPENSATION

Suppliers are obligated to pay at least the statutory minimum wage, or a wage corresponding to the industry standard if this is higher. 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 must be compensated in accordance with legal requirements (e.g. special payment/time compensation).

2.5 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 International Labour Organization (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. 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.

2.6 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. 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.

2.7 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

All employees have the right to freedom of association and collective bargaining. 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 shall establish an environmental management system that establishes clear goals to increase their environmental responsibility.

4 WHISTLEBLOWING CHANNELS

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

[HUGO BOSS Speak up Channel](#)

Or via the following QR-Code:



Or contact the HUGO BOSS Ombudsperson is available by contacting:

Dr. Carsten Thiel von Herff (External attorney)

Telephone: + 49 521 55 7 333 0 / Cell: + 49 151 58 23 03 21

Email: ombudsmann@thielvonherff.com

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

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

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 employees should be trained appropriately on the topics addressed here, on a regular basis. Furthermore, suppliers are obligated to forward these specifications or their own (in case they are equivalent to ours) to their own preliminary suppliers and to conduct suitable reviews to ensure they are complied with.

HUGO BOSS reserves the right to regularly review the Code (at least once annually) with the involvement of relevant interest groups, to adapt the code as needed, and to communicate any changes to suppliers.

If you have any questions about the code, please contact:
Compliance@hugoboss.com

Valid for:	HUGO BOSS Group	Version:	1.0
Valid from:	01.03.2024	Status:	released, valid
Approved by:	Managing Board HUGO BOSS AG	Last Update:	01.03.2024
Policy Owner:	Compliance	Classification:	public