

Marc O'Polo

EST. IN STOCKHOLM

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

FINANCIAL YEAR 2024/25.

Status: July 2026

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1. OUR COMMITMENT

We are convinced that sustainable and ethically responsible conduct is the basis for long-term business success. It is one of Marc O'Polo's core values to take responsibility for the impact of our own business activities. We are committed to respecting human rights along our value chain and working towards the implementation of these rights.

In awareness of our corporate responsibility, we have anchored human rights and environmental due diligence processes as an integral part of our organization and in our relationships with our business partners, which are constantly reviewed and further developed. "Marc O'Polo" or the "Marc O'Polo Group" refers to Marc O'Polo SE and all companies that are - directly or indirectly - affiliated with Marc O'Polo SE within the meaning of Sections 15 et seq. German Stock Corporation Act (Aktiengesetz - AktG). This policy statement is applicable to all affiliated companies of Marc O'Polo SE for the financial year 2024/2025 (01.06.2024-31.05.2025).

We base our actions on the following internationally recognized standards and guidelines:

- United Nations Universal Declaration of Human Rights
- Conventions and Core Labour Standards of the International Labour Organization (ILO) on labour and social standards
- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- UNICEF Principles on the Rights of the Child and Business Conduct
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Elimination of All Forms of Discrimination against Women
- Environmental standards in the form of the Minamata Convention, the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal

2. THE COMPANY MARC O'POLO

Marc O'Polo is an international fashion company present in over 46 countries and is headquartered in Stephanskirchen, Germany. The entire casual lifestyle brand business is concentrated under the umbrella company Marc O'Polo SE (see graphic "Corporate structure of Marc O'Polo"). The top-level controlling body of Marc O'Polo SE is the Supervisory Board, chaired by majority shareholder Werner Böck. As an owner-run family business, the company's Supervisory Board also comprises other representatives of the owner family (find more information in our [sustainability report 2024/25](#) on page 6).

The Executive Board comprises 5 members and manages the business of Marc O' Polo SE.

Despite the continuing difficult and uncertain market situation, the Marc O' Polo Group grew by 4.9 per cent and generates net sales of €631 million in the 2024/25 financial year (1st June 2024 to 31 May 2025).

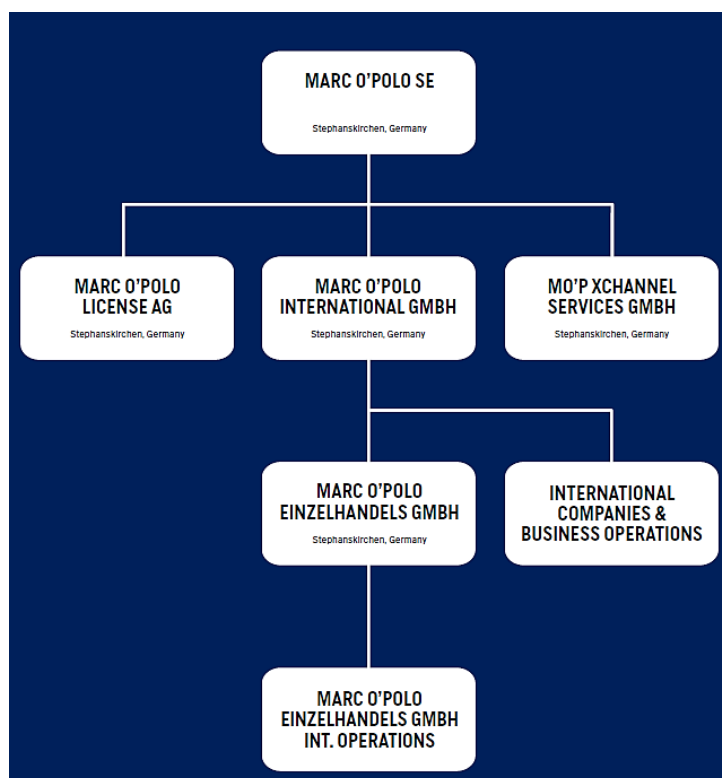


FIGURE 1: CORPORATE STRUCTURE OF MARC O'POLO SE

3. SUSTAINABILITY MANAGEMENT AT MARC O'POLO

Corporate responsibility and mindful action are highly valued at Marc O'Polo and are firmly integrated into our corporate organisation. We have a central Sustainability & Corporate Responsibility unit that reports directly to our Chief Product Officer. This focus enables efficient coordination and clear responsibilities, and underscores the strategic importance of sustainability within the company. The team brings together experts with knowledge in the areas of environmental management, product compliance, social responsibility, climate and circular strategies, more sustainable materials and certifications and sustainability reporting.

The clear structure provides the basis for addressing the diverse range of topics in a coherent and effective manner and with a high degree of technical depth, ensuring that sustainability is taken into account in all key areas of activity. Regular coordination formats promote the consistent implementation and further development of our sustainability strategy. The subject matter experts exchange information every two weeks, the entire sustainability team meets monthly, and every eight weeks there is an extended dialogue with representatives from other relevant areas of the company. This interdisciplinary exchange is essential to implementing sustainability activities consistently and comprehensively. This is how we ensure the long-term integration of sustainability across the Group in our core business. Monthly reports are submitted to the Executive Board in order to ensure the transparent management of the sustainability strategy, initiatives and projects.

New or urgent topics, projects or actions are presented by the respective heads of area, discussed with the Executive Board and approved by it. This clearly regulates both operational responsibilities and strategic control and monitoring of sustainability issues at the highest level of the company.

4. OUR SUPPLY CHAIN

In order to fulfil our corporate due diligence, we need a comprehensive understanding of our entire value chain, from upstream to downstream processes. Only when we know which actors are involved and under what conditions the individual steps are taken can we identify, address and counteract social risks like [forced labour](#).

In a global and diversified supply chain such as the textile and apparel industry, the various partners in the upstream value chain involved in the manufacture of our products are represented in successive stages (known as tiers). The aim is to achieve transparency and understanding of processes and suppliers involved, from the production of raw materials to packaging.

We worked with 102 direct partners in the last financial year (previous year: 95). Some of these partners are agencies; in other cases, we work directly with manufacturing suppliers.

As is common in the textile industry, a supplier often has several factories behind it that take on different production steps or expand production capacities. We have transparency regarding the garment factories in our supply chain—regardless of whether they are owned by our suppliers or their subcontractors. During the reporting period, 129 garment factories were part of our supply chain (PY: 132).

We currently work with 132 (PY: 87) known tier 2 partners for apparel, of which 42 (PY: 25) are in Europe, 82 (PY: 55) are in Asia and 8 (PY: 7) are in North Africa.

Our main production countries for garments, shoes and accessories, based on purchasing volume, are India (29%), Turkey (20%), China (19%), Vietnam (13%), Portugal (6%), Tunisia (3%) and North Macedonia (2%).



FIGURE 2: SUPPLY CHAIN STRUCTURE OF MARC O'POLO SE

5. POLICIES

We have several policies implemented to promote the respect for human rights in our business and at our business partners. Our Marc O' Polo Supplier Code of Conduct for Trading Goods defines labour standards, following the standards of the Fair Wear Foundation. It includes - among others - the principles 'No Forced or Bonded Labour' and 'No Exploitation of Child Labour'. The violation of these principles is regarded as 'Zero Tolerance Issue' in the BSCI as well as the Fair Wear auditing scheme.

According to our policies, no ID cards may be retained, overtime must be voluntary, wages or bonus payments may not be withheld and every worker must be able to terminate their employment contract in compliance with the statutory notice period and within the framework of the applicable labour law provisions.

More Guidelines and Reports are available in our [download section](#).

6. OUR DUE DILIGENCE AND RISK MANAGEMENT PROCESSES

Marc O'Polo has human rights due diligence processes implemented, which are oriented towards the United Nations Guiding Principles on Business and Human Rights (UNGPs). Core elements of our due diligence processes are our human rights and environmental risk analyses. Based on their results, Marc O'Polo has several measures implemented, to avoid or mitigate the identified salient issues. Our risk management process includes the following steps:

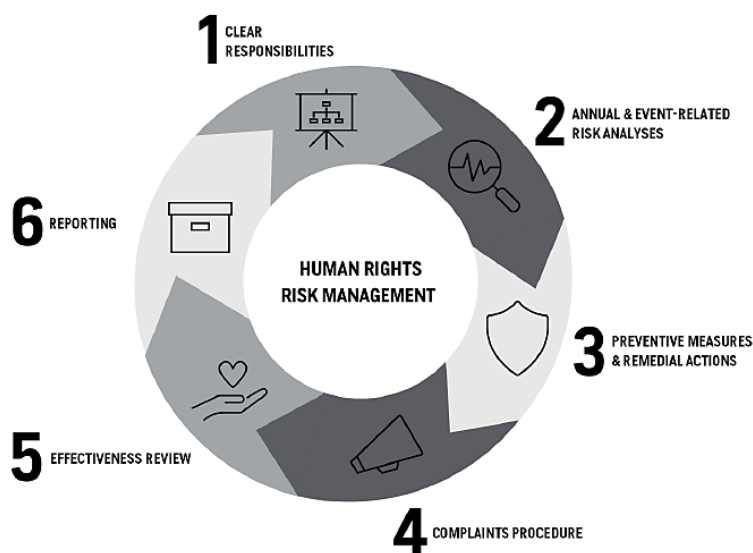


FIGURE 3: HUMAN RIGHTS DUE DILIGENCE AND RISK MANAGEMENT PROCESS

We know that an adequate due diligence is a continuous process. Therefore, we regularly analyze and review our risks and update our analyses as well as our measures.

7. OUR RISK ANALYSIS

As part of our risk analysis, we identify human rights-related and environment-related risks in connection with our business activities, both at our own sites and at our direct suppliers. Risks are assessed on the basis of industry and country risks, which are included in the assessment in the form of relevant indices. The results of this abstract risk analysis are then checked for plausibility and the risks are further weighted and prioritized. Our ability to influence the party directly responsible for a potential violation as well as the expected severity and probability of occurrence of potential violations play an important role here. We also look at the measures and processes that the supplier has already implemented to respect human rights. The risk analyses described are carried out annually and on an ad hoc basis. If we obtain substantiated knowledge at indirect business partners, we carry out risk analyses as well.

In our human rights risk analysis, we identified several areas which present work-related human rights risks, including occupational health and safety, working hours, pay, human trafficking and forced labour, child labour and discrimination.

The results of the analysis of human rights-related and environment-related risks have an impact on the processes for selecting suppliers and form the basis for implementing appropriate measures both in our own business area and with our direct business partners.

The following potentially affected groups of people are the focus of our efforts to respect human rights: our own employees at national and international locations, employees of our direct and indirect business partners and local communities. We are aware that there are vulnerable groups within these groups of people that are particularly worthy of protection.

These risk analyses form a solid basis for our materiality analysis, which is described in detail in our [sustainability report 2024/25](#) page 25 and 36.

8. PREVENTIVE AND REMEDIATIVE ACTIONS

The aim of our preventive and remedial measures is to protect affected groups of people and to avoid, eliminate or minimize adverse human rights-related and environment-related impacts and risks. We derive our preventive and remedial measures from the risk analysis, the complaints procedure and audits in order to promote respect for human rights in our own business and in our supply chain.

With our **Marc O'Polo Supplier Code of Conduct**, we define our ethical and legal principles for our merchandise suppliers, which they must recognize as part of the contractual relationship. They must also contractually agree to the implementation of risk-based preventive measures.

For identified risk suppliers, we carry out **audits** in accordance with the amfori BSCI or Fair Wear Foundation standard. With regard to forced labour, the auditors check how employees are recruited,

whether any overtime worked is voluntary, that wages are paid on time and in full; and whether workers are free to move around and leave the factory premises. During the reporting period, the audits did not reveal any cases of forced labour.

The auditors also check for the possible existence of child labour. To this end, hiring processes and proof of age are checked. In the case of young workers, particular attention is paid to ensuring that they do not work overtime or perform dangerous tasks. No cases of child labour were identified in the audits during the reporting year.

In the current reporting year (2024/2025), 99.2 per cent (PY: 99.2 per cent) of our tier 1 suppliers had a valid audit. A total of 80 BSCI full audits, 12 follow-up audits and seven Fair Wear audits were conducted. Number of BSCI Audit results are: 27 A-ratings, 27 B-ratings, 34 C-ratings and 4 D-ratings. If suppliers complete the initial or repeat amfori BSCI audit with a rating of A- ‘Excellent’ or B- ‘Good’, another audit will be conducted after a period of two years. If the rating is just C- ‘Acceptable’ or even D- ‘Inadequate’, a corrective action plan is developed, the implementation of which is reviewed after one year at the latest as part of a follow-up audit.

Regular on-site visits to production facilities by our CSR team complement the audits and promote close cooperation and transparency with our partners.

For us, audits are the starting point for continuous improvement. After each audit, we draw up a **corrective action plan (CAP)**. Together with our partners, we evaluate the results, develop customised solutions and agree on specific deadlines for rectifying the identified shortcomings. This is not just a matter of short-term adjustments, but of permanently embedding humane working conditions in everyday business life. If suppliers commit serious or repeated violations of the Code of Conduct, termination of the business relationship will be considered. However, we consider the exclusion of suppliers to be a last resort.

We conduct regular **training sessions** on social standards for workers and management at our production sites. We use a variety of training formats to ensure that the content is conveyed effectively and in a manner appropriate to the target group. For example the fair wear worker education programme, the fair wear workplace education violence and harassment prevention programme or the fair wear factory dialogue programme (find more infos in our [sustainability report](#) 2024/25 at page 104).

In addition, where possible, we rely on **long-term partnerships** with our suppliers as well as producers and continuously develop our **purchasing practices**.

The employees in our Sustainability & Corporate Responsibility and Procurement departments pursue a joint strategy when **selecting new production sites**. While the Procurement department is responsible for proposing new suppliers, the CSR department has a decisive say in the selection process. New collaborations and contract awards can only begin after approval by the CSR department. In existing partnerships, this department has the right and responsibility to halt production if risks reach a critical level. An analysis of social and environmental risks is part of the decision-making process when selecting new suppliers. In principle, our partners may nominate subcontractors, but these must first be reviewed and approved by us. The unauthorised use of subcontractors is not permitted.

Home workers may only be hired after prior review and approval by Marc O' Polo.

We have implemented a **complaints procedure** through which employees, business partners, suppliers, customers and other potentially affected groups of people can report violations to us at any time. The portal is a protected and secure reporting channel that can be used anonymously and guarantees maximum confidentiality (<https://marc-o-polo.hintbox.eu>).

In addition, our **membership** of the multi-stakeholder organization Fair Wear in the high-risk area of the supply chain provides the workers of our Tier 1 suppliers with the **Fair Wear complaints mechanism**, which enables them to report violations anonymously by phone or email, largely in the local language. We follow up on all reported information and substantiate suspicions of possible human rights-related and environment-related risks and violations in accordance with a reporting and investigation process. The aim is to resolve every complaint together with those affected and those responsible.

9. OUR PARTNERS

As a medium-sized company, Marc O' Polo has limited room for manoeuvre on its own. That is why we rely on trusting partnerships and the combined strength of cooperation.

AMFORI BSCI

Amfori BSCI is a leading corporate initiative designed to improve working conditions in global supply chains. The initiative stands for a globally uniform supply chain management system that aims to review and improve working conditions. Marc O' Polo has been a member of amfori BSCI since 2009.

CASCALE

Cascale, formerly known as the Sustainable Apparel Coalition (SAC), is a global non-profit alliance with over 300 member companies worldwide from the apparel, footwear, home textiles, sports and outdoor goods and bags and accessories industries. Cascale sees itself as a catalyst for collective action to enforce more equitable and restorative business practices in the consumer goods industry. The initiative owns and develops the Higg Index with the aim of objectively and systematically recording and measuring social and environmental sustainability performance along the value chain. Marc O' Polo has been a candidate for Cascale membership since July 2023.

FAIR WEAR FOUNDATION

In 2020, we joined the Fair Wear Foundation (FWF). This independent multi-stakeholder initiative based in Amsterdam works with clothing brands, factories, NGOs, trade unions and governments to improve working conditions in textile factories.

RETRACED

We are partners with retraced. The Dusseldorf-based start-up offers a tool for improving supply chain transparency and traceability from the end product to the origin of the raw material.

Find more partners in our [sustainability report](#) 2024/25 page 27.

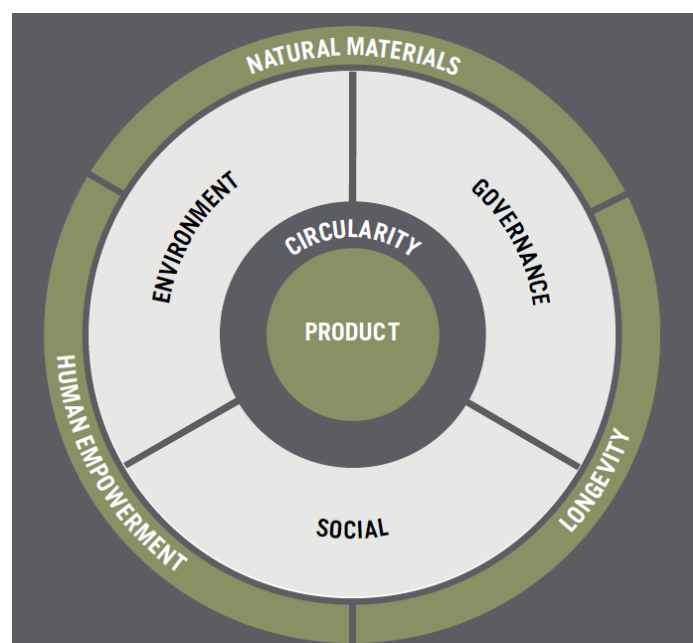
10. EFFECTIVENESS REVIEW

We will review the effectiveness of our measures and processes, including our complaints procedure, on a regular and ad hoc basis using defined effectiveness criteria. When designing measures and processes to address prioritized human rights-related issues or confirmed incidents, the objective to be achieved by these measures or processes is defined in advance. If measures or processes prove not to be effective, we adapt them.

11. PRIORITIES FOR YEAR AHEAD/ PLANNED NEXT STEPS

We adopted our updated sustainability strategy, IT'S ON US 2030+, last year. It forms the basis for our strategic 'Sustainability Leader' initiative. Our strategic framework has four pillars: environment, social responsibility, governance and product. We have added a dimension that is vital to us to the classic ESG model: our product. Behind each pillar are selected sub-topics for which we have defined specific goals and measures.

FIGURE 4: OUR STRATEGY - IT'S ON US. 2030+



For the “social” pillar we defined the following core targets:

OUR BASELINE:

- Fair Wear Leader Status
- 99 per cent of our tier 1 suppliers with a social audit
- Fair Wear complaint mechanism has been in place in our supply chain since 2021
- Member of amfori BSCI since 2009

OUR CORE TARGETS:

YEAR	TARGET	STATUS	
Ongoing	FAIR WEAR STATUS: Maintain Fair Wear Leader status	100%	● achieved
	COMPLAINT MANAGEMENT: Validated complaints are processed and addressed with effective remedial measures	100%	● achieved
2025	FEMALE EMPOWERMENT: Develop a programme to promote gender equality and the advancement of women in the supply chain	100%	● achieved
	SOCIAL AUDITS: 100 per cent of our tier 1 suppliers have a valid social audit and a plan for corrective measures	99%	● In progress
2027	SOCIAL AUDITS: 100 per cent of our strategic tier 2 suppliers have undergone a social audit by a third party	–	● In progress
	HUMAN RIGHTS TRAINING: 30 per cent of our tier 1 suppliers have received training on relevant human rights issues	16%	● In progress
	FEMALE EMPOWERMENT: Implement the programme to promote gender equality among strategic suppliers	25%	● In progress
2030	LIVING WAGES: Marc O’Polo contributes to developing wages in our supply chain towards a living wage.	–	● In progress

FIGURE 5: SOCIAL CORE TARGETS OF MARC O’POLO

This statement was approved by all members of the Executive Board.

This Statement is signed by Maximilian Böck, CEO of Marc O’Polo SE

MAXIMILIAN BÖCK (CEO)

MARC O’POLO SE



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