



Code of Conduct

Version: 01	Replaced version: -	Prepared/revised by: Working Group on the German Supply Chain Due Diligence Law
Valid from:	Dated: -	Checked/approved by: Management
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Acknowledgement of the Code of Conduct

We,

(company name, legal form)

- sign the Code of Conduct with legally binding effect,
- declare with our signature that we share the objectives and principles of the Code of Conduct and will make every appropriate and reasonable effort, within the bounds of our respective capabilities, to deliver on our assurances and commitments on an ongoing basis at all our company locations,
- communicate the contents of the Code of Conduct in an appropriate manner to our employees, business partners and other key stakeholders,
- expect our supply partners to act in line with the contents of the Code of Conduct or a comparable code of conduct, and encourage them to demand the same in turn from the contractual partners in their supply chain, and
- take any violation of the Code of Conduct seriously and enable our employees, business partners and all other persons to report any violations to us in confidence using the following contact details:

Contact option (fill in as applicable):

Name of the reporting office and/or name of the contact person

Email

Telephone

Website:

Place, date

Signature

Name of authorised signatory, position

Preamble

Through their economic activities, the companies in the supply chain of the OLYMP Bezner Group (the entities of the OLYMP Bezner Group are hereinafter jointly referred to as "OLYMP") make a valuable contribution to the sustainable development of the countries and regions in which they operate. The companies are committed to the principles of the social market economy and to free and fair world trade. They are aware of their social responsibility and advocate the economically, socially and ecologically sustainable structuring and development of their supply chains in Germany and abroad.

In order to support companies in fulfilling their social responsibility, the Confederation of the German Textile and Fashion Industry (Gesamtverband der deutschen Textil- und Modeindustrie, (textil+mode)) and the German Retail Federation (Handelsverband Deutschland, HDE) have jointly issued the Code of Conduct of the German Textile and Fashion Industry. OLYMP has supplemented this with its own requirements, which partly go beyond the Code of Conduct of the German Textile and Fashion Industry. At no point have the requirements of the Code of Conduct of the German Textile and Fashion Industry been weakened.

The Code of Conduct reflects the basic common understanding of socially responsible business actions in the OLYMP Bezner Group and the OLYMP supply chain.

1 Basic understanding and validity

We, the undersigned company, see ourselves as part of the societies in which we do business and commit to socially responsible corporate governance by taking into account the direct and indirect effects of our business activities on society as well as on the environment and by continually striving to bring these into an appropriate balance of interests in economic, social and ecological terms.

We act in accordance with generally recognised values and principles, such as integrity and legality, and in particular respect the internationally recognised human rights and labour standards as set out in the Code of Conduct.

We share the objectives and principles of the Code of Conduct and will make every appropriate and reasonable effort, within the bounds of our respective legal and actual capabilities, to deliver on our assurances and commitments on an ongoing basis at all our company locations in Germany and abroad. Where existing national regulations conflict with the contents of the Code of Conduct, or the domestic context makes it impossible to follow the content in full, we shall seek ways to nevertheless uphold with the requirements of the Code of Conduct wherever possible.

2 Human rights and labour standards

We respect human dignity and internationally recognised human rights as set out in particular in the United Nations (UN) Universal Declaration of Human Rights¹ and addressed in the UN Guiding Principles on Business and Human Rights² as well as the OECD Guidelines for Multinational Enterprises³. We also take into account the internationally recognised labour standards of the International Labour Organisation (ILO), as listed below in the Code of Conduct.

In all our business activities, we always strive to neither cause nor contribute to human rights violations. We expect the same from our business partners. Where necessary and possible, we support our supply partners in this regard.

2.1 Employment relationships

We treat our employees with appreciation. We reject all forms of unlawful punishment, abuse, harassment, intimidation or other undignified treatment towards workers.

We abide by the respective applicable labour law in all employment relationships and expect our contractual partners to do the same. At the beginning of the employment relationship, workers shall be provided, in a language they understand, with information about the key terms and conditions of their employment, including their rights and duties, as well as the working hours, remuneration and payment and accounting procedures.

We respect and protect the right of employees to terminate their employment in due observance of the respective applicable notice period.

Obligations to employees arising from the regular employment relationship (e.g. social security contributions) shall not be avoided by means of restrictions in their employment contract or by means of training schemes where there is no real intent to impart skills or provide regular employment.

Young workers are to be given the opportunity to take part in education and training schemes.

It is impermissible to threaten discontinuation of employment without good cause.

¹ Universal Declaration of Human Rights

² UN Guiding Principles on Business and Human Rights

³ OECD Guidelines for Multinational Enterprises

2.2 Prohibition of child labour and protection of young workers⁴

We do not tolerate child labour, and we observe the applicable legal minimum age for admission to employment. In any event, we do not employ persons under the age at which compulsory education is completed according to the law of the place of employment, or under the age of 15.

We expect our contractual partners to have adequate means of determining age in order to prevent child labour. If child labour is discovered, all necessary measures focusing on the welfare, protection and development of the child shall be taken without delay.

In the case of persons under the age of 18, the rights of young workers shall be respected, and such persons may only be hired if it is ensured that the working and employment conditions do not pose a risk to their health, safety or morals, nor are harmful to their development.

Persons under the age of 18 must not perform night-work.

2.3 Prohibition of forced labour⁵

We reject all forms of forced or compulsory labour, including any form of bonded labour, serfdom, slavery or slave-like practices and human trafficking as well as any other involuntary labour and services that are inconsistent with internationally recognised labour and social standards. Further forms of forced labour may also include: a threat or use of physical violence, false promises, compulsory overtime, etc. We hereby affirm on a legally binding basis that none of the aforementioned forms of forced or compulsory labour exist at our establishments, and we demand the same of our suppliers.

Employees must not be forced to lodge a "deposit" or their identification documents with their employer.

Employees shall not be obliged to pay for entry into a job.

Employees shall not be obliged to use accommodation or means of transport provided by the company.

We provide the greatest possible protection and support to women, who face greater difficulties in leaving an exploitative working environment or avoiding compulsory and excessive overtime due to low pay and a low quota of women in managerial positions.

⁴ ILO Convention Nos. 138 and 182

⁵ ILO Convention Nos. 29 and 105

2.4 Remuneration⁶

We abide by the statutory provisions or – where applicable – the collective agreement provisions in the remuneration of labour services.

Wages and benefits paid for a normal working week (a maximum of 48 hours) must at least match the statutory or sector-specific minimum wage and always suffice to satisfy the basic needs of the workers and their families and provide a certain level of income.

In countries or regions without a statutory minimum wage or collectively agreed wage framework, we take special care to ensure that the wage paid for regular full-time employment is sufficient to meet the basic needs of the employees.

To this end, we undertake – together with our business partners – to work towards our share of a living wage. In this respect, we shall be guided by national and international benchmarks as laid down by, among others, trade unions or the Global Living Wage Coalition.

Bilateral agreements to undercut the statutory minimum wage are impermissible.

Wage deductions as a disciplinary measure are just as impermissible as wage deductions that are not provided for in national law.

Deductions must never constitute an amount that leads to employees receiving less than the minimum wage.

The workers shall be provided, in a language they understand, with appropriate and clear information about wages, including the wage rates, wage period and overtime remuneration policies.

2.5 Working hours⁷

We abide by the statutory or applicable collective agreement provisions on working time, including overtime, rest breaks and annual leave. In any event, we make sure that

- the regular weekly working time does not exceed 48 hours plus a maximum of 12 hours of overtime per week,
- the right to rest breaks is respected on each working day,
- six consecutive working days are regularly followed by a day off, and
- public or religious holidays and holiday leave are respected.

Overtime shall be compensated for or remunerated at least in accordance with statutory or collectively agreed provisions; it shall be ordered exceptionally and exclusively on a statutory, collectively agreed or contractual basis.

Overtime shall always be compensated for by means of a premium rate or compensatory time off.

⁶ ILO Convention Nos. 26 and 131

⁷ ILO Convention No. 1; ILO Recommendation No. 110

2.6 Freedom of association⁸

We respect the right of workers to freedom of association, freedom of assembly and the right to collective bargaining and wage negotiations, insofar as this is legally permissible and possible in the respective country of employment. We also recognise the right of all workers to form trade unions and join trade unions.

We give preferential treatment to countries and supply partners where freedom of association is ensured.

We avoid countries where this is not permissible. These countries may be included in our supply chain by way of exception. In such case, we seek appropriate compromises for the workers. There must exist throughout at least an worker representation established by free election.

All workers who have been employed at the company for at least 6 months shall have, in the election, the same opportunities and participation option regardless of the nature of their contract (e.g. fixed term, part-time) and place of work (e.g. homeworking).

Employee representatives must not be discriminated against and must have free access everywhere in order to perform their representative role.

The time spent by employee representatives shall be regular working time and must not lead to excessive overtime.

2.7 Diversity and inclusion, prohibition of discrimination⁹

We promote a work environment that enables inclusion and where the diversity of our employees is valued. We are committed to equal opportunities and reject all forms of discrimination or unjustified unequal treatment in employment, for example on the basis of national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief.

The equal treatment of migrant workers and local workers shall likewise be ensured.

In particular, the equality of opportunities shall apply to the hiring and wage policy, development opportunities (further training, promotion, etc.), practices for ending the employment relationship, as well as retirement.

We also take into account the principle of equal pay for workers of all genders for work of equal value. Occupation-related additional benefits must accrue to each employee equally.

Women also require special attention in this regard:
Recruitment must not involve a pregnancy test.

⁸ ILO Convention Nos. 11, 87, 98, 135 and 141

⁹ ILO Convention Nos. 100, 111 and 159; ILO Recommendation No. 165

Maternity protection shall at least conform to the statutory framework, and mothers must not be discriminated against in any way (e.g. lower pay upon returning to work than prior to maternity protection).

2.8 Health and safety at work¹⁰

We adhere the national and international occupational health and safety standards and ensure a safe and healthy working environment in order to maintain the safety and health of our employees, protect third parties and prevent accidents, injuries and work-related illnesses.

This entails regular workplace risk assessments and the implementation of appropriate hazard prevention and precautionary measures, including the provision of appropriate personal protective equipment free of charge.

We ensure that our employees are trained in all relevant occupational health and safety topics.

Special protection shall be given to vulnerable employees, such as (but not exclusively) young workers, mothers-to-be and young mothers or disabled persons.

Where accommodation is made available, it must be clean and safe and fulfil the employees' basic needs.

Physical mistreatment, a threat of physical mistreatment, punishments or disciplinary measures, as well as sexual and other harassment and intimidation are strictly prohibited.

We also pay particular attention to the special needs of women in this respect:
Access to clean toilet facilities in working order shall be granted, and toilet visits shall not be limited.

Women are particularly exposed to workplace violence and harassment. We reject all forms of verbal and sexual harassment and physical abuse.

Furthermore, expectant and new mothers shall enjoy special protection (e.g. no physically demanding work, no night-work, etc.).

¹⁰ ILO Convention Nos. 155, 183 and 184; ILO Recommendation No. 164

3 Ecological responsibility

The protection and preservation of natural resources is the responsibility of each and every one of us. With that in mind, we conduct our business activities with due regard for ecological aspects and are committed to the goal of a climate-neutral future.

3.1 Protecting the environment and climate

We honour our ecological responsibility by complying with applicable legal requirements and recognised standards for the protection of the environment and climate and by making efforts to continuously improve the impact of our business activities on the environment and climate.

We have taken appropriate measures that are guided by legal and internationally recognised standards, such as the ZDHC, covering the following topics among others:

- Professional and responsible handling of hazardous substances and other chemicals, as well as waste, including disposal;
- Efforts to reduce or prevent waste and minimise emissions from operations (e.g.: waste water, exhaust air, noise, greenhouse gases);
- Conservation of natural resources, for example through measures to save water, chemicals and other raw materials;
- Promoting the use of closed-loop and other climate-friendly and environmentally friendly technologies, processes, raw materials and products;
- Efforts to increase energy efficiency and the proportion of green or renewable energy consumed at our company locations.

3.2 Animal and species protection

We observe the principles for the protection of animals and biodiversity and align our business actions accordingly. The keeping and use of animals must comply with the applicable legal animal welfare requirements and be appropriate to the species. The "Five Freedoms of Animal Welfare" of the World Organisation for Animal Health (WOHA)¹¹, the Washington Convention on International Trade in Endangered Species (CITES)¹² and the "International Red List" of the International Union for Conservation of Nature (IUCN)¹³ shall be complied with.

¹¹ WOHA (Five Freedoms): <https://www.woah.org/en/what-we-do/animal-health-and-welfare/animal-welfare/>

¹² CITES (Washington Species Protection Convention): <https://cites.org/eng/disc/species.php>

¹³ IUCN (Red List): <https://www.iucnredlist.org/>

4 Ethical business practices and integrity

We pursue only legitimate business objectives and practices and maintain business relationships only with reputable partners.

We conduct ourselves in a fair and appreciative manner towards our business partners and customers. We respect the different legal, economic, social and cultural backgrounds and circumstances of the countries and regions in which we operate. We always base our business actions on universally valid ethical values and principles, including integrity and respect for human dignity.

We support free and fair world trade and abide by the laws and legislation of the countries and regions in which we do business.

4.1 Corruption¹⁴, trade control, money laundering

We reject all forms of bribery and corruption and avoid even the appearance thereof, whether in the form of granting or accepting unfair advantages.

We act in accordance with the applicable import and export control regulations and abide by the legal requirements for the prevention of money laundering.

4.2 Fair competition

We support free and fair competition. We do not tolerate any anti-competitive agreements and ensure that we act in accordance with the applicable antitrust laws. We reject competitive advantages through unfair business practices.

4.3 Personal data, protection of confidential information and intellectual property

We respect the privacy rights of our employees, business partners and customers and, when handling personal information, abide by the applicable legal and official requirements relating to the processing of personal data and to information security.

We take great care to ensure that trade secrets and other confidential information that our business partners and customers entrust to us are adequately protected against unauthorised acquisition, use and disclosure, but at least in accordance with the relevant statutory provisions on the protection of trade secrets.

We respect the intellectual property of our business partners, customers and other third parties and, when transferring know-how and technologies, ensure that sufficient precautions are taken to protect intellectual property rights.

¹⁴ United Nations Convention against Corruption

4.4 Consumer interests

Where our products and services affect the interests of consumers, we have taken appropriate measures to ensure the safety and quality of the products or services we offer. In doing so, we ensure that our products or services comply with the relevant statutory provisions on consumer protection.

In the context of information and sales activities, we take consumer interests into account by applying fair business, marketing and advertising practices and promoting consumer education. We pay particular attention to the interests of children, senior citizens, people with disabilities and other vulnerable consumer groups.

5 Implementation

We make appropriate and reasonable efforts to comply with the contents of the Code of Conduct on an ongoing basis at all our company locations. We have established suitable measures and processes for this purpose and document their implementation within the company in an appropriate manner. The company's management team informs itself at regular intervals about the implementation and work of the responsible departments and people.

5.1 Communication and training

We communicate the contents of the Code of Conduct to our employees, business partners and other key stakeholders and train our employees on individual aspects of the Code of Conduct as required. We expect our employees to comply with the Code of Conduct.

5.2 Expectations regarding our supply chains, control measures

The contents of the Code of Conduct also reflect our expectations regarding our supply partners and other contractual partners in our supply chains. In this respect, we expect them to act in line with the contents of the Code of Conduct or a comparable code of conduct, and we encourage them to demand the same in turn from the contractual partners in their supply chain.

We always value long-term business relationships based on partnership. Therefore, before entering into a supply relationship, we identify and check our contractual partners in an appropriate manner, e.g. through self-disclosure, supplier evaluation or the like.

We reserve the right to monitor our supply partners' compliance with our expectations, e.g. by means of auditing. If serious violations are discovered, we expect that these will always be responded to with appropriate preventive or remedial measures. Where this is not the case, we reserve the right to appropriate contractual consequences, including termination of the business relationship.

5.3 Notification of violations

OLYMP takes any violation of the Code of Conduct seriously. If violations are reported, OLYMP shall initiate measures for proper and confidential clarification and, if necessary, take appropriate countermeasures for rectification or prevention.

Complaints can be lodged via complaints@fairwear.org or, or the OLYMP whistleblower reporting channel via OLYMP's external data protection officer, solicitor Ulf Neumann, using the following contact details:

Solicitor Ulf Neumann
Lederstraße 134
72764 Reutlingen
Telephone: +49-(0)7121-347654-0
Fax: +49-(0)7121-347654-9
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