A photograph of a rustic cabin with a stone chimney, a large rock formation, and children playing in a courtyard. The scene is set in a natural, wooded environment. The cabin has a dark exterior and a large window. A stone chimney with a metal pipe extends from the roof. A large, flat rock formation is visible behind the cabin. In the foreground, a wooden table is set with plates and glasses. Two children are sitting at the table. Another child is kneeling on the ground, playing with a toy. A woman is sitting on the ground near the chimney, tending to a fire. The sky is clear and blue.

# Responsible Business Conduct Policy

**CREATE  
TOMORROW'S  
VINTAGE**

Nudie JEANS co

# Responsible Business Conduct Policy

## Introduction

The purpose of the Nudie Jeans Responsible Business Conduct Policy (RBCP) is to define a framework for our business practices upstream and downstream. The framework helps us navigate our work as responsibly as possible. The RBCP commits that our business contributes to lesser environmental and social negative impacts as much as technically, economically, and practically possible within the scope of our business. Nudie Jeans engagement stretches beyond national and EU legislations for production performances and has materialized it by endorsing voluntary schemes that support more responsible practices where possible.

## Policies and Commitments

The Responsible Business Conduct aims to reaffirm our commitment to conscious and liable business conduct in full respect of the key principles introduced in our full policy portfolio including:

- Internal Sourcing Policy
- Climate Policy
- Code of Conduct
- Living wage policy
- Chemical policy
- Transparency policy
- Human Right Policy and anti-slavery statement
- Animal Welfare Policy
- Material Tool
- Travel Policy
- Internal Purchase Policy
- Anti-corruption Policy

The Nudie Jeans board of directors has overall responsibility for environmental and social work. The RBCP applies to employees, directors, and members of the board as well as contractors, consultants, and freelancers working as part of our operations. Employees are expected to read, understand, and follow our Responsible Business Conduct Policy, including our external and internal policies.

Employees should also be transparent in any decisions and actions taken. Employees should never use their position, company assets, or deals for private gain. Violations of the Responsible Business Conduct Policy, including violations of any Nudie Jeans policies and instructions, will not be accepted.

- We commit to following the policies listed above and specified below, and the work procedures that will follow to comply with these policies.
- We commit to promote gender equality and empowering women in our supply chain through our programs, on living wages, leadership, and social dialogue as supported by the Living wage Policy and Code of Conduct.
- We commit to encouraging worker representatives to participate in assessments, meetings, and discussions with the management wherever it is relevant as per the Code of Conduct and Fair Wear Foundations (FWF) Code of Labour practice.
- We commit to facilitating training for implementing democratically elected worker committees as per the Code of Conduct.
- We commit to hearing and addressing complaints by Fair Wear complaint procedure and/or other legitimate processes.
- We commit to reducing the use of harmful chemicals in production as listed in the Chemical Policy.
- We commit to supporting the transition to renewable energy in the supply chain as listed by the Climate Policy.

In addition, we have listed other commitments that fall under a responsible business:

- We commit to optimizing the circular business areas, including our repair, reuse and recycling activities, and assessing the social and environmental aspects of the reverse supply chain.
- We commit to shared responsibility and dialogue on production planning and capacity with our supply chain partners.
- We commit to working toward equality between genders in terms of pay for similar roles, positions, and advancement at our offices as well as in the supply chain.
- We commit to increase our knowledge on our business' biodiversity impact and to build strategies to reduce the negative impact and to increase the positive impact on biodiversity.

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**Nudie Jeans respects the rights under the United Nations' Universal Declaration of Human Rights, The Core Conventions of the International Labor Organization, The OECD Guidelines for Multinational Enterprises, The Fair Wear Foundation Code of Labour practices and to follow the chemical legislation of the European Union.**

- We commit to assessing water use in our production and to strive to reduce water use by promoting more efficient water processes as well as the use of high-quality water treatment plants.

In addition to fulfilling our compliance obligations, Nudie Jeans is dedicated to meeting the mutually binding requirements with all relevant stakeholders. These encompass legal and regulatory mandates, customer relationship expectations, network collaboration, and coalition commitments.

### Human Rights and Environmental Due Diligence

As a business within the apparel textile industry, the largest human rights and environmental risks are associated with the upstream supply chains.

To prevent and mitigate risks, risk assessments are made on sector, business model, sourcing model, process, material, product level, country, and supplier level. Data is collected through research reports, but also primary data from regular visits, assessments, and local staff. The country and supplier of human rights risk assessments contain a gender lens. We work with a data management system that generates timebound action plans for suppliers in tier 1, which aims for continuous improvements.

Nudie Jeans carries out human rights due diligence on risks covered but not limited to the Fair Wear Code of Labor Practices as well as environmental due diligence on risks by Global Organic Textile Standard (GOTS). The salient risks identified are child labor, discrimination, gender equality, forced labor, excessive hours of work, health and safety, freedom of association and collective bargaining, right to a living wage, hazardous chemicals, water treatment and water consumption, water pollution, greenhouse gas emissions, loss of biodiversity, bribery, and corruption. These salient risks are mainly associated with suppliers within tier 2, 3, and 4 in the upstream supply chain.

### Prevention & Mitigation Measures

Nudie Jeans aims to have fair and long-term relations both in the upstream and downstream supply chain. We set responsible procurement standards, collaborate for innovative design and embed fair sourcing and purchasing with suppliers.

### Sourcing Model

Nudie Jeans aim to work with suppliers that share our ambitions and values regarding human rights, labor practices, climate, environment, and ethics. The primary preference is always sourced from existing suppliers. Nudie Jeans strives to maintain long-term relationships with our primary suppliers, based in a limited number of countries. We might occasionally have to re-think the product, design,

or details to achieve this goal. We must also take responsibility for reasonable quantities and lead times in the supply chain.

Nudie Jeans' sourcing strategy together with the supplier evaluation process are fundamental in decisions for sourcing. With accordance to indexes on environmental, climate, democracy, social and human rights risk per country we can screen supplier's capabilities and capacity meet our requirements to set up the foundation for long-term business relationships, manage expectations and reach our goals. The supplier evaluation ensures it's upheld by both parties.

Supplier contracts define the general purchasing agreement and the contingency plan to provide a general legal framework to the entire production process and relationship with the suppliers regarding lead time, delivery, and terms of fulfillment, as well as terms of payment.

#### **Purchasing practices**

Responsible purchasing at Nudie Jeans defines are but not limited to:

- Long-term relations
- Order and material forecasts
- Setting delivery dates in collaboration and with respect to suppliers' capacity
- Fair in terms of price negotiations
- Yearly supplier survey and action plan

Nudie Jeans strongly encourages transparency at every level and therefore also in costs and purchasing practices for production and certified fabrics. To prevent negative impacts and measure the development, Nudie Jeans applies assessment methods and performance indicators, monitors operational practices, learns from experience, and improves continuously.

#### **Expectations of supply chain partners**

For both new and existing supply relationships, compliance with the Nudie Jeans Code of Conduct, Chemical Policy, and Transparency policy is essential. Our Code of Conduct is based on the Fair Wear Foundation Code of Labor Practice and reflects our commitment to acting ethically and with integrity in all our business relationships. The requirements stated in our Chemical Policy are set in line with best practices within the textile industry and legislation in our sales countries in and outside the EU.

We apply the same expectations to main suppliers and subcontractors. There is no direct financial relationship to subcontractors as our main suppliers. Subcontractors are only accepted if they comply with stated ethical and environmental standards to have a proficient and fair collaboration. We encourage our suppliers to identify and develop ongoing performance improvements, promoting responsible business practices throughout the entire supply chain, as per all the goods and services purchased for, and utilized in our production.

Our Transparency policy is needed to keep track of the partners in the supply chain. Suppliers and factories must share our non-negotiable values, and transparency and trust within all business relationships is key to implementing and enforcing effective systems and controls to ensure any human right violation is not taking place anywhere in our supply chains. As part of our membership of the Fair Wear Foundation we require all manufacturing units to fill in and sign the FWF Questionnaire, the supplier thereby agrees to be audited by independent third-party social auditors.

Compliance is mandatory throughout all the steps of the garment supply chain where we make a direct purchase. Moreover, noncompliance with it could lead to action including termination of the supplier agreement. The product development and production department are responsible for maintaining and implementing the processes defined in this policy.

### Capacity building

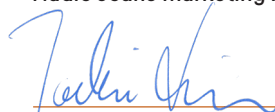
Nudie Jeans believe investing in the supply chain in terms of implementing capacity building programs, such as living wage programs, together with suppliers and worker representatives to enable safe and fair working conditions, and to secure continuous improvements. Investing in renewable energy enables energy transition and resource-effective processes.

We commit to using our position to influence stakeholders and politicians for a more responsible and fair textile industry while actively collaborating with value chain stakeholders and partners, including other producing brands.

### Tracking and communication

We monitor, measure, and review our sustainability performances regularly through our annual sustainability report. This includes alignment with the Sustainable Development Goals framework, GRI and the annual audit by Global Organic Textile Standard (GOTS), the annual emission calculation and the biannual Brand Performance Check by Fair Wear Foundation. We ensure continuous progress by creating adequate and challenging goals and strategies moving forward.

Nudie Jeans Marketing AB



Joakim Levin, CEO  
Göteborg, 2026-02-17



Björn Johansson, Chair of the Board  
Göteborg, 2026-02-17