

# Code of Business Conduct

## Scope

The Code of Conduct is binding for all employees and business partners of Promodoro Fashion GmbH. It sets ethical standards and ensures compliance with social and environmental minimum requirements across all business areas and the supply chain.

This Code of Business Conduct outlines our ethical standards and is binding for all employees of Promodoro Fashion GmbH. It sets a framework of certain non-negotiable minimum standards of behaviour in key areas all employees commit to. It is designed to guide our actions and decisions to ensure we conduct our business in an ethical and legal manner.

## Compliance with the law

We are committed to conducting our business in full compliance with all applicable laws, rules, and regulations in Germany and in any other country where we operate. Employees are expected to understand and follow the laws and regulations that apply to their roles and responsibilities. This compliance must never be compromised.

## Good Corporate Governance

We are committed to good corporate governance, including transparent reporting and strong internal controls. We believe that good corporate governance is essential for the long-term success of our company.

## Fair Business Practices

We are committed to conducting our business in an ethical manner. This includes honest advertising, fair pricing, and respect for intellectual property rights. We expect all our employees to uphold these standards in all their dealings with customers, colleagues, and competitors.

## Fair competition

Agreements and concerted practices between competitors are prohibited if their objective or effect is to prevent or restrict competition. We believe in fair and open competition. We do not engage in illegal practices such as price-fixing, market allocation, or other activities that can harm competition. We comply with all applicable antitrust and competition laws.

## Fair Payment Practices

We believe in treating our suppliers and employees fairly. This includes paying invoices on time and providing fair wages to our employees. We are committed to not using exploitative labour practices and expect all our employees to uphold these standards.

## Fair Supplier and Stakeholder Business Relationships

We believe in treating all our stakeholders with respect and fairness. This includes honouring contracts, treating suppliers with respect, and engaging in fair negotiation practices. We expect all our employees to uphold these standards in their dealings with our suppliers and other stakeholders.

**Zero tolerance of Corruption, Bribery, Fraud and Money laundering Violations**

Corruption, bribery, any forms of fraud, money laundering and anti-trust violations will not be tolerated. We prohibit our employees from engaging in any form of the mentioned violations. While dealing with business partners, they must never demand or accept anything of value which could be understood as an attempt to influence business activities. We comply with all applicable anti-corruption laws and regulations.

**Conflict of interest**

Employees must avoid situations where their personal interests could conflict, or appear to conflict, with the interests of the company. Employees are expected to act in the interest of Promodoro Fashion. Own personal demands should not in any way influence the professional task. Any potential conflicts of interest should be reported to a supervisor or the Human Resources department.

**Data protection and information security**

Promodoro Fashion declares to fully respect and protect the privacy of its employees, customers, suppliers, and other stakeholders. All personal data collected and held by the company will be processed fairly, transparently, carefully and in compliance with the locally applicable data privacy laws. Confidential employee and business information shall not be disclosed to anyone outside the company without proper authorisation or unless required by law. Furthermore, we work together with a third-party Data Protection Officer to ensure all necessary standards are upheld at any given time. We protect personal data in accordance with applicable data protection laws.

**Diversity, Equality and Inclusion**

Our company is committed to fostering, cultivating, and preserving a culture of diversity, equality, and inclusion. Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

**Equal Opportunities**

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

**Non-Discrimination**

Our company does not and shall not discriminate on the basis of race, color, religion (creed), gender, gender expression, age, national origin (ancestry), disability, marital status, sexual orientation, or military status, in any of its activities or operations. These activities include, but are not limited to, hiring and firing of staff, selection of volunteers and vendors, and provision of services.

**Inclusive Environment**

We are committed to providing an inclusive and welcoming environment for all members of our staff, clients, volunteers, subcontractors, vendors, and clients. We aim to create a workplace where everyone feels valued and respected and where diversity, equality, and inclusion are integral parts of our values and goals.

## **Reporting and Addressing Discrimination and Harassment**

Any employee who believes they have been discriminated against or harassed should report the matter to their supervisor or the Human Resources department. All complaints will be treated with the utmost confidentiality, investigated promptly, and resolved appropriately. Any employee found to be engaging in any type of unlawful discrimination or harassment will be subject to disciplinary action, up to and including termination of employment.

## **Labour and human rights**

We respect internationally recognised human rights and support their observance. We respect and support the protection of human rights within our sphere of influence. We do not tolerate child labour, forced labour, or any form of exploitation. We are committed to providing a safe and healthy working environment for all our own employees and workers in our supply chain. This includes a ban of any kind of child and forced labour and respects non-discrimination and non-harassment, the recognition of the freedom to associate, collective bargaining and social partnership, fair compensation, good working conditions, adequate working hours and paid leave.

We request that every supplier we work with has at least one certification guaranteeing their commitment to human and labour rights, which include, but are not limited to, Amfori BSCI, WRAP, Sedex, and Better Work.

## **Good working conditions**

Our company is committed to providing a safe, healthy, and positive working environment for all our employees. We believe that good working conditions are essential for our employees' well-being, productivity, and job satisfaction, and are a key factor in our company's success. We comply with all applicable laws and regulations regarding working hours and compensation. We ensure that our employees are paid fairly for their work and receive additional compensation for overtime and other forms of work beyond their normal working hours. We value our employees' feedback and strive to improve their job satisfaction. We conduct regular employee satisfaction surveys and use the results to identify areas for improvement and implement necessary changes.

## **Occupational health and safety**

Compliance with all legislation to protect humans and the environment is of highest priority. This is applicable to our products as well as to our processes.

Thus, all our employees regularly receive training in first aid, fire prevention, evacuation measures, health and safety risks, good working practices and workplace security. We also ask our employees to deal responsibly with natural resources and to protect the environment within the given work scope.

Furthermore, all our products meet safety standards, we ensure our products are safe for use and do not pose any harm to our customers.

## **Training and Career Management**

Our company is committed to supporting our employees' professional development and career growth. We believe that training and career management are crucial for our employees' job performance, motivation, and retention, and for our company's competitiveness and innovation.

We conduct regular performance evaluations to assess our employees' job performance and identify their strengths and areas for improvement.

We provide a variety of training and development programs to enhance our employees' job-specific knowledge and skills and support their professional growth. These programs include on-the-job training, workshops, seminars, e-learning, and other forms of training.

## **Respect for the Environment**

We are committed to minimising our environmental impact and promoting sustainability. We comply with all environmental laws and regulations. We strive to use resources efficiently and reduce waste.

## **Reporting Violations**

Employees are encouraged to report any suspected violations of this Code, laws, rules, or regulations. We will not tolerate any form of retaliation against those who make reports in good faith.

## **Enforcement and Consequences**

Violations of this Code may result in disciplinary action, up to and including termination of employment. In some cases, violations may also result in legal action.

This Code of Business Conduct is not exhaustive, and it does not cover every situation that may arise. It is intended to provide a framework to guide us in our business conduct. When in doubt, employees should seek guidance from their supervisors, the Human Resources department, or the Legal department.

This Code is reviewed periodically and may be amended at any time. By adhering to this Code, we can ensure that Promodoro Fashion GmbH continues to operate with integrity and respect and maintain the trust for all our stakeholders.

## **Responsibilities**

The executive management is responsible for ensuring and regularly updating the Code of Conduct. The finance lead implements the Code in the personnel area and conducts training sessions. The sustainability lead promotes the integration of sustainability principles and raises awareness among all stakeholders. The quality lead monitors compliance with social and environmental standards among production partners and suppliers.

In addition, all employees are required to adhere to the principles outlined in the Code of Conduct within their area of responsibility and actively contribute to its implementation. This includes promoting ethical behavior, identifying deviations, and taking appropriate measures within their capabilities when necessary.



Date / Signature of responsible person

03.12.2024

Khalil Mehanna, Managing Director of Promodoro Fashion GmbH