



SUSTAINABLE FOR TOMORROW.

CODE OF CONDUCT

INSPIRED BY YOUR JOB.



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CODE OF CONDUCT

We, the company Paul H. Kübler Bekleidungswerk GmbH & Co. KG, are committed to exercising our corporate responsibility. Driven by the responsible awareness for a socially, ecologically and economically acceptable organisation of the entire textile supply chain, we face up to the challenges posed by an increasingly connected and global world.

Our Code of Conduct is oriented on internationally recognised principles for the protection of human and labour rights as set out in the United Nations Universal Declaration of Human Rights, the ILO Core Labour Standards, the UN Guiding Principles on Business and Human Rights as well as the OECD Guidelines for Multinational Enterprises. Furthermore, this Code of Conduct draws on relevant international agreements on protection of the environment.

With this commitment we support the objective of implementing human rights as well as labour, social and ecological standards in economic value creation processes.

1. FUNDAMENTAL UNDERSTANDING OF SOCIALLY RESPONSIBLE BUSINESS MANAGEMENT

Legal compliance

We, the company KÜBLER, comply with the laws of all countries in which we do business. We take care to comply with the principles of the present Code of Conduct in our own actions – in particular in countries with a weak governance structure – and also encourage our business partners to do likewise. Where current national provisions are in contradiction with the content of the Code or the domestic context makes it impossible to meet the responsibility for respecting human rights without restriction, we nevertheless find ways of complying with the principles on internationally recognised human rights and the content of the present Code of Conduct.

Contribution to society

We, the company KÜBLER, regard ourselves as part of the societies in which we do business. Through our business activities, we contribute well-being, advancement and sustainable development in these societies. We take into consideration indirect and direct effects of our business activities on society and environment, and endeavour to bring them into an appropriate balance of economic, social and ecological interests.

We respect and accept the different legal, societal, cultural and social backgrounds of the countries into which our value creation chain extends, and recognise their structures, customs and traditions. Insofar as the latter are in conflict with the principles set out here, we will enter into dialogue with our business partners and strive for understanding and acceptance.

Ethical business conduct and integrity

We, the company KÜBLER, engage in legal business practices taking account of fair competition, intellectual property rights of third parties as well as antitrust and competition rules. We reject all forms of corruption and bribery, and promote in an appropriate manner principles of responsible business management such as transparency, accountability, responsibility, openness and integrity. Business partners have to be treated fairly. Contracts are complied with insofar as the framework conditions do not change fundamentally. Generally, ethical values and principles have to be respected; this applies in particular for human dignity and internationally recognised human rights.

2. RESPECT OF HUMAN RIGHTS

Protection of human rights is the duty of the States in which we are economically active. To support the duty of the State to protect human rights on its territory, we respect human rights. The company KÜBLER avoids infringing the human rights of others through our activities and address adverse human rights impacts with which we are involved.

To meet the responsibility to respect human rights, we exercise Due Diligence in the area of human rights as a function of the size of the company, the risk of serious human rights effects as well as the nature and context of the business activity. Due Diligence must include procedures for identifying, preventing, mitigating and, where applicable, remediating potential adverse impacts on human rights, and should cover such adverse human rights impacts that we cause or contribute to through our own activities or which may be directly linked to our operations, products or services by our business relationships.

3. LABOUR RIGHTS AND WORKING CONDITIONS

We, the company KÜBLER, respect the core labour standards of the International Labour Organisation and create a safe and decent work environment.

Freedom of association and right to collective bargaining

We, the company KÜBLER, respect the right of the workers and employers to form organizations of their own choosing - without prior authorization - which support and protect the interests of the workers. The enterprises also respect the right of workers and employers to engage in collective bargaining regarding wages and working condition. Workers may not be disadvantaged due to occupation or membership in workers' organizations.

In countries where the principles regarding freedom and right of association, as well as collective bargaining, are not adhered to i.e. the practice of these rights are limited or forbidden, we are to allow our workers to elect representatives with whom they are able to enter a dialogue regarding workplace issues. The company KÜBLER respects the rights of the workers to put forward complaints without being disadvantaged in any way. These complaints are handled with a suitable procedure.

Ban on forced labour

We, the company KÜBLER, do not accept any economic activity based on forced labour, bonded labour or serfdom. This encompasses any type of work or service demanded of a person under the threat of punishment and for which that person has not voluntarily made himself or herself available.

Ban on child labour and protection of young workers

We, the company KÜBLER, promote the effective abolition of child labour. We respect the relevant statutory minimum age for access to employment or labour. Under the provisions of the International Labour Organisation, this may not be lower than the age at which compulsory education ends and not lower than 15 years of age.

Appropriate mechanisms to establish proof of age have to be deployed in the framework of the recruitment procedure in order to prevent child labour. If we establish proof of child labour, we will initiate necessary measures for remediation and social reintegration focused on the well-being and protection of the child. We only employ young people from 16 years of age if the nature of the work performed or the work relationship does not jeopardise the life, health and morality of the young people in question and the latter receive appropriate schooling or vocational training in the relevant business sector.

Ban on discrimination in employment and profession

We, the company KÜBLER, refrain from all forms of discrimination, exclusion or preference based on ethnicity, skin colour, gender, religion, political opinion, nationality and social origin resulting in the removal or restriction of equality of opportunity or treatment in employment or profession. Furthermore, the principle of equal pay for male and female workers for the same work has to be applied.

Working hours

Insofar as applicable national laws or applicable workplace agreements do not specify a lower maximum working time, regular weekly working time does not exceed 48 hours plus a maximum of 12 hours of overtime. Overtime will be remunerated at no less than the rate laid down by law or collective agreement and has to be required only in exceptional cases. We grant our employees the right to rest periods on each working day and recognise important statutory holidays. A work-free day has to be granted after six consecutive days of work.

Remuneration

Minimum pay rates must not fall below those set by law or collective agreement. In countries without a pay framework based on law or collective agreement, we take account of the consideration that pay for regular full-time work is sufficient to meet workers' basic needs. At the same time, it is recognised that we alone cannot ensure a decent living and that supplementary benefits of the state and other social protection measures are necessary where appropriate.

Pay will not be withheld and will be paid to the worker in an appropriate form. Pay deductions are permissible only on the basis of law or collective agreement and should be itemised. Employees will be regularly informed about the composition of their remuneration.

Employment relationships

We, the company KÜBLER, comply with the provisions of national labour law. Workers have to be provided with comprehensible information about essential working conditions including working hours, remuneration as well as payment and documentation arrangements. We protect the right of workers to terminate their employment relationship taking account of the relevant notice period. In addition, we endeavour to promote workers' vocational qualifications.

Health and safety at work

Taking account of national requirements, the company KÜBLER implements appropriate measures to safeguard health and safety at work with a view to preventing work-related accidents in the framework of our activities and protecting the health of our workers.

Applicable local rules on health and safety at work as well as on building safety and fire protection will be complied with in order to minimise the risk of accidents and work-related illnesses. Where necessary and appropriate, workers will be supplied with appropriate personal protection equipment. In direct situations of danger, employees have the right and the duty to leave their workplace immediately and without permission. Vulnerable persons such as young people, young mothers and pregnant women as well as people with disabilities have to be given particular protection.

Decent treatment

We, the company KÜBLER, treat our employees with dignity and respect. Any form of undignified treatment, such as abuse, sexual harassment as well as gender-based violence will be refrained from. Disciplinary measures are set out in writing and in an understandable form.

4. ENVIRONMENTAL PROTECTION

We, the company KÜBLER, comply with applicable laws, provisions and administrative practices regarding the protection of people and the environment in the countries where we are active. Generally speaking, we exercise our business activity in such a way that we make a contribution to the general objective of sustainable development.

To this end, the company KÜBLER puts in place a system tailored to our organisation which enables us to monitor our operational activities for harmful environmental impacts and to take all necessary and appropriate measures with a view to reducing strain on people and the environment, preventing environmental damage and taking remedial action within the framework of our possibilities, taking applicable regional laws and provisions into account. We seek a constant and long-term improvement in our environmental performance by promoting the introduction of appropriate technologies and production processes which enable an efficient use of natural resources, such as water consumption and its pollution, as well as energy and the minimisation of greenhouse gas emissions.

We aim to make an evaluation of chemicals used and endeavour to select them with an eye to health and safety at work as well as consumer protection, and to substitute particularly hazardous chemicals. Proper management of waste as well as possible reuse in the framework of the recycling economy are important insofar as this is possible under local circumstances.

5. CONSUMER INTERESTS

We, the company KÜBLER, take appropriate measures to safeguard the quality of the products we offer. We ensure that our products comply with all statutory rules with regard to health and safety, and are harmless and safe in health terms for our intended use. The company KÜBLER also takes consumer interests into account by applying fair business, marketing and advertising practices and promoting consumer education.

6. ANIMAL AND SPECIES PROTECTION

In our business actions, the company KÜBLER respects the principles of animal protection. Animal husbandry and use have to be organised to meet the needs of specific species. The company KÜBLER adheres to the Washington Convention on protection of endangered species of fauna and flora (CITES) and orients its business actions accordingly.

7. COMMUNICATION

We, the company KÜBLER, communicate the content of the Code of Conduct vis-à-vis workers, contractual partners and, as and when appropriate, third parties. It has to be comprehensible for contractual partners that compliance with the Code of Conduct is in principle ensured. However, communication of operational and business secrets or competition-sensitive or other information deemed worthy of protection for legal reasons are excluded from this requirement.

8. IMPLEMENTATION AND ENFORCEMENT

We, the company KÜBLER, respect the present Code of Conduct in our own actions. We encourage our business partners to apply the Code of Conduct accordingly. We support our business partners in organising their own supply chains in such a way that human and labour rights are respected and working conditions are continuously improved.

With a view to good Corporate Governance, we enshrine the principles of responsible business management set out in the Code in our strategic and operational management systems.

8. COMPLAINTS PROCEDURE

Please let us know immediately if you have any concerns about the successful implementation of our Code of Conduct or in the event of any serious infringements of the statutory provisions or our values/requirements by our business partners and their employees. We have established a point of contact so that you can also contact us anonymously if required. In the event of complaints or suspicions please send an email to the following address: social@kuebler.eu. We pledge to comply with our commercial due diligence obligations and investigate every complaint. Sensitive data will, of course, be treated as confidential.



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Plüderhausen, 30.06.2022

A handwritten signature in black ink that reads 'Michael Stiegert'. The signature is written in a cursive style and is positioned above a horizontal line.

Michael Stiegert
General Manager

Supplier

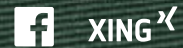


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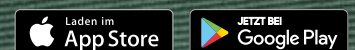
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