



# SUSTAINABLE FOR TOMORROW.

GREEN BUTTON 2.0 REPORT

INSPIRED BY YOUR JOB.











# GREEN BUTTON 2.0 REPORT

Our focus has always been on people. Our partners and end customers should receive workwear that makes work safer, more comfortable and easier. We have faced this challenge every day with determination since 1956.

Kübler provides the target group with information about the implementation of its commercial due diligence obligations in its own textile supply chains in this annual public report.

## ABOUT US

### KEY DATA

<b>Employees:</b> <b>244</b>	<b>Employees in production:</b> <b>36</b>	<b>Founded in:</b> <b>1956</b>	<b>Head office:</b> <b>Plüderhausen</b>
 <ul style="list-style-type: none"> <li>2022: 54 million €</li> <li>2021: 48 million €</li> <li>2020: 44 million €</li> <li>2019: 41 million €</li> <li>2018: 40 million €</li> <li>2017: 39 million €</li> <li>2016: 38 million €</li> <li>2015: 36 million €</li> <li>2014: 33 million €</li> </ul>	<ul style="list-style-type: none"> <li> Over 1,000,000 products permanently in stock</li> <li> Up to 30,000 products dispatched per day</li> <li> 24 hour delivery</li> </ul>	<ul style="list-style-type: none"> <li> Founder: <b>Paul H. Kübler</b></li> <li> Managing Director: <b>Thomas Kübler</b></li> <li> Director: <b>Michael Stiegert</b></li> </ul>	
<b>Number of employees:</b>			
2019: 234    2020: 231    2021: 247    2022: 244			

Today, we have 244 employees and are one of the leading manufacturers of workwear in Europe. Industrial companies, craft firms and service providers value our widely diversified range of innovative workwear, certified personal protective equipment and tailored services.

### WORKWEAR IS OUR WORLD

Our mission is to develop extraordinary and innovative premium workwear which purposely and securely supports your job and grows with the requirements of the future world of work. In line with our motto "Inspired by your job" we place the wearer at the heart of all our actions in order to offer the best services and solutions. We all have a common vision: MAKE WORK BETTER

Our workwear improves the world of work. Wearers are more motivated and work more efficiently as a result of our workwear and are optimally supported and protected when doing their job. Our products set new standards in design and function.

## OUR VALUES

### RESPONSIBILITY

- We accept our social, economic and ecological responsibilities with foresight and commitment, both regionally and globally.
- Our internal & external decisions and actions are responsible and conscientious.
- Awareness of sustainability and diligence runs through the development, manufacture and distribution of our products.

### SAFETY

- Through responsible progress and change, we deliver reliability and safety, both for our employees and our business partners.
- We further develop safety – our products protect the wearer while offering the best possible functionality and reliability.

### DEVELOPMENT

- We are open to change and innovation with foresight and courage.
- We embody a positive learning culture and view personal and business development as the key to the sustainable success of our company.
- We are passionate about developing our products.
- The safety of people and the protection of natural resources are very important to us. For this reason, we place great value on the environmentally friendliness of our products.

### RESPECT

- Our work is based on respect, trust, honesty and openness, both internally as well as with our customers and business partners.
- We mutually empower and respect each other, placing great importance on teamwork and collaboration.
- We embody open and cooperative communication where we deal with people in an authentic and respectful manner. We are committed to fair competition.

## POICY STATEMENT

We pledge to implement and improve fundamental rights, employment standards, social standards and ecological standards in the commercial supply chain. To do so we follow the internationally recognised principles for the protection of human rights and employment rights, as expressed in the United Nations Universal Declaration of Human Rights, the Core Labour Standards of the ILO, the UN Guiding Principles for Human Rights and Business, and the OECD Guidelines for Multinational Enterprises.

### ENVIRONMENT

- The safety of people and the protection of natural resources are very important to us. We therefore pledge to protect and avoid damaging the environment, and to continuously improve our quality and environmental management system.
- We always put the wearer at the heart of all our actions, in line with our motto „Inspired by your Job“. There is increasing focus on recycling and the principle of the recycling economy, alongside safety and quality aspects.

## HUMAN RIGHTS

- We maintain close contact with our suppliers to comply with our company's due diligence obligations regarding human rights.
- Voluntary commitment to pay a living wage.
- In doing so we ensure that the measures taken to fulfil our commercial due diligence obligations correspond to the requirements of vulnerable groups, such as raising our employee's awareness abroad and a suitable, accessible complaints channel.
- Voluntary commitment to responsible procurement and purchasing practices.

The systematic, regular analysis and identification of risks allows us to pursue our goal to reduce and avoid negative effects on humans and the environment.

The content of this Policy Statement can be publicly found on our [website](https://www.kuebler.eu/media/2b/54/18/1692604793/kuebler_policy_statement_v4_en.pdf) (https://www.kuebler.eu/media/2b/54/18/1692604793/kuebler\_policy\_statement\_v4\_en.pdf). It is displayed on the bulletin board for our employees and a copy is sent to our partners by post or electronically. All stakeholders should understand that compliance with this Policy Statement must be guaranteed.

We adhere to the Policy Statement with our own actions and also expect the same from our business partners. We support our partner in organising their side of the supply chain so that human rights and employee rights are adhered to, and that working conditions are continually improved.

## MOST SERIOUS RISKS

A detailed risk analysis was carried out as part of our risk management. This analysed and prioritised the human rights, ecological and integrity risks along our supply chains from raw materials to made-up products. Manufacturing at our Plüderhausen location was also considered in the analysis.

Various internal and external sources were used to carry out the risk analysis, including the UN Guiding Principles, the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment & Footwear Sector, the Amfori BSCI Countries' Risk Classification 2021 and the 2021 ITUC Global Rights Index. Various departments within the company were involved in the process, in particular the Sustainability Officers and the Management Board.

A risk analysis was carried out at made-up products level and wet processing at country level using the aforementioned sources. This observed to what extent the risks apply to the respective supplier relationships when compared with mitigation measures, such as audits (BSCI minimum requirements). The results were prioritised on the basis of the following criteria: Likelihood, influence, degree of severity (extent, scope, irreversibility). Audit reports, NGO reports, quick scans and supplier visits were used to determine information about risks that have actually occurred.

The following most serious risks (i.e., risks with potential implications which have been classified as „serious“ and could have a greater likelihood of occurring) resulted from the analysis of made-up products.

- Affected countries: China, Vietnam, Türkiye, India, Pakistan, Bangladesh.
- Specific risks in those affected countries:
  - Discrimination, sexual harassment, gender-based violence
  - Freedom of association and the right of collective bargaining
  - Living wage
  - Water consumption
  - Greenhouse gas emissions
  - Excessive overtime

The following most serious risks resulted from the analysis of wet processing:

- Affected countries: Pakistan, Vietnam, China
- Specific risks in those affected countries:
  - Discrimination, sexual harassment, gender-based violence
  - Freedom of association and the right of collective bargaining
  - Living wage
  - Greenhouse gas emissions
  - Excessive overtime

## PREVENTION, MITIGATION AND CORRECTIVE MEASURES

We focussed on the following aims and measures to prevent, mitigate and correct the resulting most serious risks:

- **Supplier Code of Conduct (CoC)**

Writing to the suppliers again, plus a declaration of the importance of accepting the CoC resulted in 100% of suppliers signing the CoC. Further goals were set to ensure effective communication, including translating the CoC into the native languages of supplier countries and obtaining evidence from 100% of all suppliers that the CoC was displayed in the workplace by 31 December 2023.

- **Supplier audits in accordance with recognised standards (BSCI, Smeta, Sedex, SA8000, FWF)**

100% of suppliers from high risk countries are regularly audited in accordance with recognised standards. This corresponds to one of our company's internal minimum criteria.

- **Effective complaints management**

Here we refer to our CoC and its effective communication within suppliers. We also have an independent email address [social@kuebler.eu], so that employees can also contact us. This meant that our objective that 100% of employees have access to a complaints system by 31 March 2023 was able to be achieved. Further objectives were also set here, including inspecting the complaints procedure on site in 70% of production sites in at risk countries by 31 December 2024. The complaints channel has also been successfully reviewed by third parties.

- **Collaboration with other actors (such as governments, trade unions, companies, MSIs, civic organisations)**

Our company holds regular consultation meetings with MaxTex, Südwesttextil [South West Textiles] and German Fashion. We are pursuing the goal of state of the art knowledge and raising awareness of the topic.

We plan to extend our Code of Conduct on the risk regarding a living wage and to communicate with suppliers obtaining their signatures on the new version by the end of 2025. In addition, working hours are monitored by BSCI audits. Further measures improving the awareness of suppliers and implementing the STeP certification are envisaged. Supplier awareness has been successful increased and one additional supplier has been OEKO-TEX® STeP certified.

We plan to extend our Code of Conduct on water consumption and greenhouse gas emissions risks accordingly and to raise awareness/communicate with suppliers obtaining their signatures on the new version by the end of 2024.

Further water consumption measures, including preferring suppliers with OEKO-TEX® STeP certification and achieving the objective of procuring 30% of material from STeP certified production sites, are also planned by the end of 2024.

We plan for suppliers to gradually disclose information on their water consumption and greenhouse gas emissions by the end of 2024 and the end of 2025.

## LEARNING EXPERIENCES, ADVANCEMENTS AND CHALLENGES

We have summarised the learning experiences and advancements resulting from measures that have been taken in the below table. Valuable experiences can be gathered from the various topics. These are core elements that we must take into consideration in future implementation.

Topic	Expectation	Cause	Learning experience
Supplier development	STeP certification within 3-6 months	Little insight into the preparations a supplier must carry out.	Just filling out the forms needs approx. 3-4 weeks. As a result a joint timeline and additional milestones were defined with suppliers to enable realistic certification to be achieved.
Supplier development	Certification in accordance with one of the higher social/combination standards	We assumed that certifications and certificates have high priority in every country.	Not every manufacturer/supplier is prepared to increase their current pool of certifications. The reasons for this are the cost, the additional work for employees, a more intensive obligation to provide proof and more frequent audits.
Supply chain transparency	Supply chain disclosure, or parts thereof	For us, disclosing the supply chain is a matter of course, without ignoring the suppliers' sourcing strategies.	As a precautionary measure data is not always provided in full when disclosing the entire supply chain. This means that the information can only be used to a certain extent.
Risk analysis	Reduce country-specific risks	We expected to be able to reduce the risks as best as possible with evidence of a social audit.	Using independent inspections we developed internal mechanisms [Quick Scan, Risk Analysis, Supplier Evaluation] which help us to ensure that country-specific risks are identified and reduced together with suppliers.
Compliance	We view legal conformity, neutrality and impartiality as a matter of course. We also expect the same from our partners.	We abide by all applicable laws and do not question them.	This requires a commitment on many levels, such as the Code of Conduct, Policy Statement and site visits, for example, in order to be able to regularly review compliance topics and ensure their effectiveness.
Knowledge and raising awareness	Suppliers' own initiative	We consider the topics of knowledge management and raising awareness essential.	Finding and retaining qualified staff with the right skills, knowledge and experience requires the skills to find solutions to complex local human rights challenges.
Balancing costs, benefits and resources	Commitment to human rights due diligence required for some tenders.	Unfortunately, price is often decisive when it comes to tenders.	Not every tender can be won as KÜBLER's ethical principles must not be compromised.

Topic	Expectation	Cause	Learning experience
Close, long-term partnerships	Collaboration through promising pilot projects.	Trust on both sides	Developing partnerships with suppliers has enabled us to implement and improve mutual, ongoing social and ecological objectives.
Membership of initiatives	Transparent communication and support	Exchange of information and knowledge, learning by doing	Membership of and collaboration with initiatives and NGOs allows us access to approaches, training, tools and networks, as well as the opportunity to share experiences with other companies.
Structural changes	Implementing a sustainability staff unit into the supply chain structure.	Sustainability topics can be holistically spread out in the areas of purchasing/ procurement, production and logistics but can also be found in development.	Procurement and Sustainability are the two most important departments in companies where human rights due diligence is planned and actually implemented. For example, it is important to pay suppliers promptly and to consider where and under which conditions new materials can be acquired for new designs. Human rights requirements are also implemented in other departments, such as Production, even if they are not explicitly contained in the functional descriptions.

## COMPLAINTS CHANNELS AND RECEIVED COMPLAINTS

Please let us know immediately if you have any concerns about the successful implementation of our Code of Conduct (CoC) or in the event of any serious infringements of the statutory provisions or our values/requirements by our business partners and their employees.

Internal and external persons can notify us of human rights or environment risks or violations in their own area/in the supply chain via various complaint channels depending on their business area.

- All stakeholders in our supply chain by email to: [social@kuebler.eu](mailto:social@kuebler.eu)
- Via the complaints channel of our sector initiative Amfori BSCI: Online-Beschwerdeformular verfügbar unter <https://www.amfori.org/content/amfori-external-grievance-mechanism>
- Whistleblower system and similar for our own employees: [hinweisgeber@schmid-frank.de](mailto:hinweisgeber@schmid-frank.de)

Those affected can speak to their supervisor or a person in a position of trust at any time without worrying that they might be disadvantaged. Incoming complaints are recorded, examined and reviewed by impartial, independent, trained employees. Complaints are investigated by independent specialists. Our compliant procedure ensures that complaints are made anonymously and can be processed in a way that protects potential whistleblowers and affected persons from retaliation. An action plan is drawn up with the corresponding department which aims to resolve the complaint and promptly remedy any human rights violations.

We have the right to resolve each complaint together with the perpetrators and those affected and to agree on reparations corresponding to the severity of the violation. The results are subsequently incorporated into our risk analysis, our action plan for human rights and the environment (such as training) and our business processes with the aim of preventing further violations.

In order to ensure compliance with the General Data Protection Regulation (GDPR), all employees are informed of the associated rights and obligations within the company and made aware of the correct way to interact with personal data. New employees undergo extensive training. Corresponding documents and provisions will be updated in line with the current valid legal situation and communicated to the employees in a newsletter.

In 2022, no complaints were received internally or from our partner companies. This positive result is verified with regular on-site visits, in part due to long-term collaboration, independent social audits, quick scans by authorised and trained personnel and raising the awareness of responsible employees.

This means we have established an effective mechanism to be able to best deal with any potential complaints that may occur.

## **INVOLVEMENT OF EXTERNAL STAKEHOLDERS AND POTENTIAL AFFECTED PERSONS**

We maintain close contact with our suppliers to comply with our company's due diligence obligations regarding human rights. Communication via traditional methods, such as telephone, emails or personal meetings, for example is carried out by the Management Board or authorised employees. In addition, a supplier open day is held. Trade fairs are also used as a meeting place.

Fair industrial relations and trade relations, long-term collaboration and continual exchange with our production operations, business partners and customers are essential to our actions.

We regularly visit our production operations. This is the basis of our mutual cooperation. Our Code of Conduct has been accepted and signed by our manufacturers and are displayed in their production facilities to keep employees informed. They may report any complaints to us directly. During these visits we engage in dialogue with management and employees to ensure that information regarding implementing due diligence obligations on site is up to date.

In the event that our requirements are not complied with, we will work with suppliers to facilitate and verify corrective measures and their implementation.

In addition, we create incentives through sharing audit costs with our suppliers and production operations.

We pay particular attention to the human rights risks in our procurement countries and vulnerable groups such as women, children, indigenous peoples, minorities, migrants and people with disabilities when analysing the risks and our integrated actions. In doing so we ensure that the measures taken to fulfil our commercial due diligence obligations correspond to the requirements of vulnerable groups, such as raising employee awareness abroad and a suitable, accessible complaints channel.

Within the scope of our contracts and policies we and our business partners pledge to adhere to and meet the requirements of the REACH Regulation, Code of Conduct and the ILO Convention whilst also complying with them.

Regular amfori BSCI audits are a compulsory minimum requirement for our production operations. We are in contact with both other amfori-BSCI members as well amfori country representatives through our amfori membership and participation in BSCI. This allows us to see support when identifying and involving external stakeholders, including potential affected persons (i.e., persons or groups who could be directly or indirectly affected by the actions of our company and business partners).



## INCREASING SUPPLY CHAIN TRANSPARENCY

The following is a list of procurement countries at the levels of made-up products and wet processing

### MADE-UP PRODUCTS

Country	Region
China	Jiangsu
China	Guangdong
China	Jiangsu
China	Fujian
China	Fujian
China	Jiangsu
China	Jiangsu
Bangladesh	Dhaka
Türkiye	Istanbul
Vietnam	Attapu - Lao People's Democratic Republic
India	West Bengal
Pakistan	Punjab
Germany	North Rhine Westphalia
Germany	Baden-Württemberg
Italy	Trentino-South Tyrol
Armenia	Lori
North Macedonia	North East
Hungary	Veszprém
Bosnia	Romania
Türkiye	Adiyaman

### WET PROCESSING

Country	Region
Germany	Sachsen
China	Liangdong
Germany	North Rhine Westphalia
Germany	North Rhine Westphalia
France	Grand Est
France	Pays de la Loire
Great Britain	Lancashire
Netherlands	Overijssel
Italy	Latium
Italy	Lombardy
Austria	Salzburg
Spain	Barcelona
Spain	Barcelona
China	Wuhan
Pakistan	Punjab
Vietnam	Ho-Chi-Minh



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Folgen Sie uns auf:



**KÜBLER Workwear App:**



Version 2 | 05/09/2023

The logo for KÜBLER WORKWEAR, featuring a stylized white arrow pointing to the right above the brand name in a bold, sans-serif font.

**KÜBLER**  
WORKWEAR