



KÜBLER WORKWEAR
HUMAN RIGHTS POLICY

INSPIRED BY YOUR JOB.



HUMAN RIGHTS POLICY

INTRODUCTION

We, the company Paul H. Kübler Bekleidungswerk GmbH & Co. KG, commit ourselves to our social responsibility, ethical behavior, and the respect and promotion of human rights in all areas of our company and along our value chain. This policy represents the company KÜBLER's views on the observance of human rights and ethical behavior, both within our own company and throughout our value chain. It is intended to serve as a template for fulfilling our due diligence obligations and as a basis for their implementation.

Fair and trustworthy cooperation is essential for us, which is why respectful interaction with our employees, customers, partners, and suppliers is always assumed.

We particularly commit ourselves to respecting the following international standards:

- The Universal Declaration of Human Rights of the United Nations
- The Sustainable Development Goals (SDGs) of the UN
- The Guidelines of the Organization for Economic Co-operation and Development (OECD Guidelines) for multinational enterprises
- The core labor standards established in the International Labour Organization (ILO)
- The Convention on the Rights of the Child of the United Nations (UN CRC)

RISIK ANALYSIS

To better assess the challenges within our value chain, we evaluate countries of origin and partners based on our risk analysis. In this, we identified the following most serious risks related to human rights:

Discrimination | Working hours & excessive overtime | Freedom of association | Living wages | Corruption & bribery, as well as child and forced labor.

Any violations are assessed and appropriately sanctioned. The results of complaints are incorporated into our future risk analyses and our action plan to prevent further violations.

LABOR RIGHTS AND CONDITIONS



The creation of a safe and dignified workspaces has highest priority at KÜBLER. Hence, we focus especially on the following measurements:

1. Prohibition of Child Labor and Protection of Young Workers

We, the company KÜBLER, are committed to the effective abolition of child labor.

We distance ourselves from the worst forms of child labor, including human trafficking, forced labor, slavery, and any form of involvement in illegal activities **(ILO 182)**.

We observe the respective legal minimum age for admission to employment or work, which, according to the provisions of the International Labour Organization, must not be below the age at which compulsory schooling ends and not below 15 years **(ILO 138, UN CRC 32)**.

We only employ young people from the age of 16 if the nature or conditions of the work they perform do not endanger their life, health, or morality, and if they receive appropriate job-related instruction or vocational training in the relevant economic sector.

As part of the hiring process, appropriate mechanisms for age verification are in place to prevent child labor.

If we detect child labor, we will initiate necessary remedial measures and social reintegration, placing the well-being and protection of the child at the center of our actions.

2. Prohibition of Forced Labor and Modern Slavery

Respect for international standards regarding the prohibition of forced labor and modern slavery is considered an essential component of our corporate culture. We strive to ensure that no one is forced to work under exploitative or degrading conditions against their will **(ILO 29, ILO 105)**. We do not accept any economic activity along our value chain that is based on forced labor, debt bondage, or servitude.

Employment relationships at KÜBLER are based on voluntariness and can be terminated in compliance with the legal framework. This means that no one is compelled to work through coercion, threats, or the withholding of personal documents. Employees must be free to leave their jobs after giving notice in accordance with the law and must not be subject to penalties or retaliation for doing so.

These principles apply not only within our own company but also to all suppliers and service providers in our value chain. We expect them to uphold the same standards. If violations are identified, we reserve the right to take corrective action or to terminate the business relationship.

3. Prohibition of Discrimination and Exclusion

Cultural diversity represents one of our foundations for sustainable success. Our international environment, both within the company and along the value chain, is always respected in all its facets. Any form of discrimination, exclusion, favoritism, or violence that is based on ethnic origin, skin color, gender, religion, political opinion, national origin, or social background and that leads to the elimination or impairment of equality of opportunity or treatment in employment or occupation must be refrained from **(ILO 111, ILO 190)**.

In particular, we pay attention to the human rights risks of vulnerable groups such as women, children, religious and ethnic minorities, refugees, non-native speakers, people with a particular health condition, members of the LGBTQIA+ community, migrant workers, as well as peoples living in indigenous and tribal communities **(ILO 159, ILO 169)**.

We, the company KÜBLER, treat our employees with dignity and respect. Any form of degrading treatment, such as abuse, sexual harassment, and gender-based violence, must be refrained from. Based on our corporate values, our goal is to prevent discrimination at KÜBLER through preventive measures. These measures include employee training, the implementation of equal treatment policies, and the creation of an inclusive corporate culture.

Disciplinary measures are recorded in writing and in a comprehensible form. If external companies are engaged to

ensure work processes along our value chain, they are also expected to comply with our policies and human rights. We expect our suppliers and business partners to adhere to the same high standards with regard to human rights. We conduct regular assessments of our supply chain and work closely with our partners to achieve sustainable improvements. If a violation of our standards is identified, we reserve the right to take corrective action or to terminate the cooperation.

4. Fair Working Conditions

We, the company KÜBLER, are committed to fair, safe, and dignified working conditions along our value chain. We demand from ourselves and all our business partners to comply with local legal standards and not to tolerate any violations. The rules of national labor law must be observed. Employees must be provided with understandable information about the essential working conditions, including working hours, remuneration, and payment and billing modalities. The company KÜBLER protects the right of employees to terminate their employment relationship in compliance with the applicable notice period.

The key framework conditions for fair working conditions include the following:

- **Working hours and excessive Overtime:**

Working hours must be reasonable and regulated, without excessive overtime. Unless applicable national laws or collective agreements stipulate a lower maximum working time, regular working hours must not exceed 48 hours per week plus a maximum of 12 hours of overtime per week. Overtime must be compensated at least in accordance with the respective legal or collectively agreed regulations, and its imposition must remain an exception. We, the company KÜBLER, grant our employees the right to rest breaks on each working day and observe the applicable public holidays. After six consecutive working days, a day off must be granted. We regularly review compliance with the maximum permissible working hours and minimum rest periods in our company to protect the health and safety of employees.

- **Fair remuneration, including compliance with the payment of legally prescribed minimum wages:**

Fair remuneration, including compliance with the payment of legally prescribed minimum wages, is a fundamental requirement for us. Statutory or collectively agreed minimum wages must not be undercut. We, the company KÜBLER, recognize that in countries without collective or statutory wage frameworks, wages for regular full-time work must be sufficient to meet the basic needs of employees. At the same time, we are aware that the company KÜBLER alone cannot ensure a livelihood consistent with human dignity, and that state supplementary benefits and other social protection measures may be necessary. Wages are not withheld and are paid regularly in a form suitable for the employee. Wage deductions are only permitted within the legal or collectively agreed framework and must be disclosed. Employees are regularly informed about the composition of their remuneration.

- **The principle of equal pay for male and female workers for work of equal value (ILO 100)**

The principle of equal pay for male and female workers for work of equal value (ILO 100) is observed. We strive for fair remuneration for all our employees, regardless of origin or gender. Equal work should be rewarded with equal pay.

- **Development of strategies to support living wages:**

We are committed to developing strategies to achieve living wages. We aim to pay a living wage that enables employees in the supply chain to meet an adequate standard of living. Through research into actual wages paid during audits and visits, we seek to gain an overview of the current wage level in partner companies in order to compare it with recognized published reference values. The company KÜBLER is aware that the payment of living wages can only be achieved through the cooperation of all actors in the supply chain. Our goal is to develop solutions together with our partners and suppliers through trust-based dialogue in order to promote living wages and prevent the financial exploitation of employees along our supply chain.

- **Promotion of Professional Qualifications:**

The promotion of professional qualifications of our employees lays the foundation for sustainable success. We therefore offer our employees the opportunity to participate in various training courses for professional development. Individual needs are regularly identified and implemented.

5. Freedom of Association and the Right to Collective Bargaining

We, the company KÜBLER, respect the right of employees and employers to form organizations of their own choosing without prior authorization and to join such organizations and freely elect their representatives, with the aim of promoting and protecting the interests of employees or employers. Every four years, a new works council is constituted at KÜBLER on the basis of the Works Constitution Act. The works council, as the employee representation body, has corresponding co-determination and consultation rights.

We respect the right of employees and employers to engage in collective bargaining on wages and working conditions. Employees must not be disadvantaged in their employment because of their membership in employee organizations **(ILO 87, ILO 98)**.

In countries where the principles of freedom of association, the right to organize, and collective bargaining are not upheld or where the exercise of these rights is restricted or prohibited, we allow our employees to freely elect their own representatives with whom they can enter dialogue on workplace issues.

6. Occupational Health and Safety

We, the company KÜBLER, are obligated to take appropriate measures to ensure health and safety in the workplace, taking into account national requirements, in order to prevent occupational accidents and protect the health of our employees in the course of our activities. Valid local regulations on occupational safety, health and safety at the workplace, as well as building safety and fire protection, are observed in order to reduce the risk of accidents and occupational diseases to a minimum.

Where necessary and appropriate, employees are provided with suitable personal protective equipment (PPE). In situations of immediate danger, employees have the right and the duty to leave their workplace immediately and without permission.

Vulnerable persons such as young workers, young mothers and pregnant women, as well as people with disabilities, receive special protection **(ILO 155)**.

To ensure optimal and individually tailored measures for health and safety at the workplace at KÜBLER, we are supported and advised by an external safety specialist and an external occupational physician.

The Occupational Safety Committee is a body that deals with issues of occupational safety and health protection. The committee is composed of representatives of the employer, the works council, the occupational physician, and the safety specialist. The Occupational Safety Committee has, among other things, the following tasks: regular review of safety policies, analysis of accidents, evaluation of new work processes, as well as the adoption and implementation of protective measures.

Our professional association, BG ETEM, ensures the financial and medical care of employees in the event of occupational accidents or occupational diseases.

In addition to the above-mentioned guidelines and laws, we at KÜBLER implement the Workplace Ordinance and the regulations of the statutory accident insurance (DGUV).

7. Data Protection

Personal data is handled with extraordinary due diligence to ensure and comply with the General Data Protection Regulation (GDPR). The use and distribution of such data must occur exclusively within the scope of business and lawful purposes.

Confidential information from KÜBLER as well as from partners and its distribution must always be treated with the utmost care. For this purpose, all employees are informed about the associated rights and obligations within the company and are sensitized to the correct handling of personal data.

New employees must acknowledge the company's internal data protection policy. Any changes to this policy are communicated internally to all employees.

8. Ethical Business Practices and Integrity

Compliance with legal provisions, guidelines, standards, and ethical norms is the foundation for sustainable and long-term business success. KÜBLER relies on adherence to national and international laws and regulations that secure business activities. These include, among others, the areas of labor law, environmental protection, data protection, taxation, antitrust law, and financial regulation.

In addition to compliance with laws and guidelines, compliance also includes the application of ethical principles and integrity in corporate governance as well as among the workforce. KÜBLER is therefore committed to ensuring that all activities are in line with moral standards.

Through regular education and instruction, KÜBLER ensures that employees understand and comply with expectations regarding compliance. An essential component of compliance at KÜBLER is the identification and management of risks associated with non-compliance with laws or rules. Our goal is to minimize these risks through appropriate processes and procedures.

An important tool for this is the training and education of employees so that relevant laws and company policies can be understood and followed. In addition, we focus on monitoring and controlling compliance with our compliance policies through regular audits and reviews.

In the event of violations of compliance policies, sanctions and consequences, including legal action, may be imposed depending on the severity of the violation. Adherence to compliance standards helps strengthen the trust of customers, business partners, and employees and minimize legal risks.

9. Complaint Mechanism

We encourage our employees as well as all the people working in our supply chain to report potential violations of the Code of Ethics. Concerns regarding the successful implementation of our policies as well as significant violations of legal provisions and our values or requirements must be forwarded to us without delay.

We are committed to complying with corporate due diligence obligations and process every report. Sensitive information is, of course, treated confidentially by us.

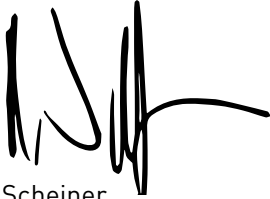
KÜBLER has established a secure channel for whistleblowers to report grievances, together with an external data protection officer. This gives whistleblowers the opportunity to report anonymously and without fear of any reprisals. You can address any concerns in writing, among other ways, to social@kuebler.eu.

10. Continuous Improvement and Transparency

We are aware that external influences and changing business activities can alter the risks that form the basis of our actions. For this reason, continuous review and updating of the risk analysis and the measures within the framework of due diligence management is essential, through which we continuously develop our sustainability management. We communicate our commitments publicly on our website, as well as in our internal information channels, where they are accessible to all employees.

Responsibility for the implementation and compliance with this declaration lies with the management of Paul H. Kübler Bekleidungswerk GmbH & Co. KG.

Plüderhausen, 01.04.2025

A handwritten signature in black ink, consisting of several vertical strokes followed by a horizontal line extending to the right.

Richard Scheiner
CEO



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Folgen Sie uns auf:



KÜBLER Workwear App:



Version 1 | 01.04.2025

The logo for KÜBLER WORKWEAR, featuring a stylized white arrow pointing right above the text 'KÜBLER' and 'WORKWEAR' in a smaller font below it.

KÜBLER
WORKWEAR