



**KÜBLER WORKWEAR**  
**CODE OF ETHICS**

**INSPIRED BY YOUR JOB.**



# CODE OF ETHICS

## INTRODUCTION

We, the company Paul H. Kübler Bekleidungswerk GmbH & Co. KG, commit ourselves to our social responsibility, to respect and promote ethical principles and behaviors in all areas of our business and along our value chain. Fair and trustworthy cooperation is a matter of course for us.

Our KÜBLER values—APPRECIATION, DEVELOPMENT, RESPONSIBILITY, and SAFETY—form the foundation and thus the guiding principle for our social actions, both internally and externally.

This Code of Ethics serves our employees and business partners as a guide to communicate and jointly realize our ethical and moral ideas.

As a guide, we particularly commit ourselves to respecting the following international standards:

- The Universal Declaration of Human Rights of the United Nations (UN)
- The Sustainable Development Goals (SDGs) of the UN
- The Guidelines of the Organisation for Economic Co-operation and Development (OECD Guidelines) for multi-national 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)
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## ETHICAL BUSINESS PRACTICES AND INTEGRITY:



We, the company KÜBLER, pursue legal business practices in compliance with fair competition, third-party intellectual property rights, and antitrust and competition law regulations. We reject all forms of corruption and bribery and promote principles of responsible corporate governance such as transparency, accountability, responsibility, openness, and integrity in an appropriate manner.

Special caution applies to unfair business practices, such as accepting bribes, price fixing, abuse of power imbalances, money laundering, or breach of trust. Contract terms must be fair for all parties, and violations must be avoided in all areas of the value chain. Employees and business partners are at all times subject to the applicable legal requirements in competition and antitrust law.

Business partners are to be treated fairly. Contracts are to be honored unless the framework conditions change fundamentally. General ethical values and principles are to be respected, particularly human dignity and internationally recognized human rights.

## PROHIBITION OF DISCRIMINATION AND FAIR TREATMENT OF ALL INVOLVED:



We, the company KÜBLER, expect dignity and respect in the interaction of our employees with each other as well as from business partners. Any form of discrimination, exclusion, favoritism, violence, or abuse based on ethnic origin, skin color, gender, religion, political opinion, national origin, and social background 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)**.

Our value chain extends across several continents and cultural circles. We therefore see cultural diversity as one of the cornerstones for sustainable success. We pay particular attention to the human rights risks of vulnerable groups such as women, children, religious and ethnic minorities, refugees, non-native speakers, people with special health conditions, members of the LGBTQIA+ community, migrant workers, and indigenous peoples **(ILO 159, ILO 169)**.

Based on our corporate values, our goal is to take preventive measures to prevent discrimination. These include training for employees, the implementation of equal treatment policies, and the creation of an inclusive corporate culture.

Forced labor, as well as the employment of children and minors contrary to applicable laws or regulations such as those of the ILO, are rejected. Working hours and overtime must comply with the respective local legal requirements. Employees should be guaranteed access to freedom of expression and the right to collective bargaining. These aspects are explained in detail in our **Declaration of Principles on the Respect for Human Rights**.

Disciplinary measures are recorded in writing and in an understandable form. The guideline on the General Equal Treatment Act (AGG) is accessible to all employees at any time.

## OCCUPATIONAL HEALTH AND SAFETY:



People with disabilities receive special protection **(ILO 155)**.

The company Paul H. Kübler Bekleidungswerk GmbH & Co. KG has safety-related support in accordance with the Occupational Safety Act (ASiG). Legally required deployment times and additional resources are provided to the prescribed and necessary extent. The responsible safety specialist and the occupational physician are shown in the valid organizational chart.

Occupational health care or aptitude examinations are carried out with the help of an occupational physician. With the support of our safety specialist and the occupational physician, we are always striving to offer our employees a safe and health-promoting workplace that meets state-of-the-art.

Maintenance and servicing tasks are defined in writing via maintenance plans. Completed tasks are marked as such. Tasks that cannot be handled internally are handed over to specialist companies (e.g., maintenance of our fire protection systems). If necessary, corresponding service contracts are concluded.

The foundation for successful safety and occupational health support is the risk assessment in accordance with the

Occupational Safety Act (ArbSchG). The company has a risk assessment that is reviewed and, if necessary, adjusted for up-to-dateness at regular intervals. Our employees are regularly instructed in safety matters.

## DEALING WITH THE ENVIRONMENT AND RESOURCES:



We, the company KÜBLER, comply with the applicable laws, regulations, and administrative practices for the protection of people and the environment in the countries in which we operate. We generally conduct our business activities in such a way that they contribute to the overall goal of sustainable development.

KÜBLER demands from itself and its partners a responsible handling of resources and raw materials at all times. Waste is to be avoided, and the constant optimization of resource use, energy consumption, and the proper disposal and recycling of waste should always be exemplified.

The goal is to organize waste disposal in compliance with the relevant regulations, in particular the KrW/AbfG "Law for the Promotion of Circular Economy and Ensuring Environmentally Compatible Waste Disposal."

In principle, the following priorities are set for waste disposal:

1. Waste prevention
2. Waste recovery
3. Waste disposal

We always demand compliance with applicable standards and environmental regulations.

Our climate goals up to 2030 have been defined with our climate strategy, and we are working continuously on their implementation in order to achieve them.

## SUSTAINABLE PROCUREMENT:



Along our value chain, we strive for responsible procurement and purchasing practices. Through forward-looking action and continuous communication, we promote an open business relationship and planning security on both sides.

We and our business partners commit, within the framework of our contracts and guidelines, to comply with and achieve the requirements in accordance with applicable legal regulations, our Code of Conduct, and the ILO conventions.

Regular auditing is a mandatory minimum requirement for our production facilities. In doing so, we consider country risks, risks of our suppliers, and risks of our own business activities, procurement, and purchasing practices.

We follow the UN Guiding Principles and the OECD Guidelines for fulfilling due diligence to promote responsible supply chains in the apparel industry.

## **DATA PROTECTION:**

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

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

New employees must acknowledge the company's data protection policy; changes to this policy are communicated internally to all employees, and supplementary training is provided.

## **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 Code of Conduct as well as significant violations of legal provisions and our values or requirements must be forwarded to us immediately by our business partners and their employees.

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

KÜBLER has established a secure channel for whistleblowers to report grievances together with our external data protection officer. This gives whistleblowers the opportunity to report anonymously and without fear of any reprisals.

## **TRANSPARENCY:**

To avoid conflicts of interest and ensure clear communication, we at KÜBLER strive for transparent interaction between the company, employees, and business partners. This approach is intended to support clear decision-making, which can only arise based on equal access to relevant information.

We also communicate our commitments and principles, such as this Code of Ethics, publicly on our website and make them accessible to all employees via our internal information channels.

We are aware that external influences and changing business activities can alter the risks that form the basis of our actions. Therefore, continuous review and updating of our risk assessment and the measures within the framework of due diligence management are essential, through which we continuously develop our sustainability management.

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

Plüderhausen, 01.04.2025



A handwritten signature in black ink, appearing to read 'RS', with a long horizontal stroke extending to the right.

Richard Scheiner  
CEO



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**KÜBLER Workwear App:**



Version 1 | 01.04.2025

