



SUSTAINABLE FOR TOMORROW.

POLICY STATEMENT

INSPIRED BY YOUR JOB.



HUMAN RIGHTS & ENVIRONMENTAL OBLIGATIONS

POLICY STATEMENT

INTRODUCTION

We, Paul H. Kübler Bekleidungswerk GmbH & Co. KG, recognise our social responsibility. Driven by our responsible awareness of social, ecological and economic organisation of the entire supply chain, we face the challenges of an increasingly networked and global economy.

We are a member of the German fashion association, GERMAN-FASHION MODEVERBAND DEUTSCHLAND E.V. and have pledged to adhere to their Code of Conduct. As a member of MAXTEX, we work together to promote sustainable action along the entire supply chain.

We see our mission statement as informal, open, honest and appreciative. Our values are RESPECT, DEVELOPMENT, SAFETY and RESPONSIBILITY.

We always treat our colleagues, customers, partners and suppliers with mutual respect. We recognise the importance of cultural diversity and appreciate different values and standards. Our company is enriched by employees of various nationalities. We believe that fair, trustworthy collaboration should be self-evident.

Our principles are based on the following:

- United Nations Universal Declaration of Human Rights (UN Guiding Principles)
- International Labour Standards Policy of the International Labour Organization (ILO)
- OECD Guidelines for Multinational Enterprises
- REACH Regulation for all industrial chemicals
- SUPPORTING FAIRTRADE COTTON sustainability concept
- RoHS CE mark for electronic devices

SUSTAINABILITY - ENVIRONMENT

We are aware of our responsibility to society and the environment and are convinced that in the future we can only be successful if we take this awareness into consideration in all our actions. The safety of people and the protection of natural resources are very important to us. For this reason, we place great value on the environmental friendliness of our products and their manufacturing process. We therefore pledge to protect and avoid damaging the environment, and to continuously improve our quality and environmental management system. We aspire to implement the ZDHC requirements (Zero Discharge of Hazardous Chemicals). It goes without saying that we comply with our binding commitments and the requirements we have imposed upon ourselves.

We have already laid important foundations for sustainable business practices.

Since 2015 we have adopted a CODE OF CONDUCT, are DIN EN ISO 9001:2015 and DIN EN ISO 14001:2015 certified by TÜV Rheinland, have implemented the SUPPORTING FAIRTRADE COTTON sustainability concept and almost all of our products fulfil STANDARD 100 by OEKO-TEX®.

The pilot project „SUPPORTING FAIRTRADE COTTON“ was initiated in 2019 in collaboration with multiple partners from the occupational clothing branch. The aim is to continually increase the demand for fairly traded cotton. The Fairtrade sourced ingredient model for cotton enables farmers to sell larger quantities of their cotton at Fairtrade conditions. We are opening up the way to fairer trading conditions, social change and greater environmental protection.

When developing our collections, we always put the wearer at the heart of all our actions, staying true to our motto „INSPIRED BY YOUR JOB“. There is increasing focus on recycling and the principle of the recycling economy, alongside safety and quality aspects. We currently contribute to protecting the environment by intelligently selecting the raw materials used which improve the durability of our products and have repair options that comply with standards. One main focus in this area is using an ever-greater proportion of sustainable materials. We want to develop and realise joint solutions for this with our numerous partners from the textile sector.

RESPECTING HUMAN RIGHTS

Protecting human rights is the duty of the respective countries in which we do business. We respect human rights in order to support the duty of countries to enforce human rights in their territories. We avoid activities that curtail the fundamental rights of others.

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

We work together with our partners and suppliers to pay a living wage as we recognise that this is a human right and have also included it in our Code of Conduct.

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. We pay particular attention to the human rights risks in our procurement countries and vulnerable groups such as women, children, religious and ethnic minorities, refugees, non-native speakers, people with a particular health status, LGBTQIA+ people, migrant workers and people with disabilities when analysing the risks and our integrated actions. We have identified their needs as: no discrimination, equal opportunities, translations into their native language and educational opportunities.

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. Translations of our Code of Conduct, Policy Statement and corresponding images will make it easier to accessibly communicate the requirements contained in our policies.

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.

VOLUNTARY COMMITMENT TO RESPONSIBLE PROCUREMENT AND PURCHASING PRACTICES

We pledge to always use responsible procurement and purchasing practices along our supply chain. We promote open business relationships and planning security for both sides through anticipatory actions and continual communication.

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 BSCI audits are a compulsory minimum requirement for our production operations.

In doing so, we examine Federal State risks, supplier risks and risks resulting from our own business activities, procurement and purchasing policies.

We follow the UN Guiding Principles and the OECD Guidelines to fulfil the duty of care to promote responsible supply chains in the fashion industry.

We determined the following most serious risks in our risk analysis: Discrimination | Working time / Excessive overtime | Freedom of association | Living wage | Hazardous chemicals | Water consumption / Water pollution | Greenhouse gas emissions | Corruption and bribery.

Further information about these areas can be found in our [CODE OF CONDUCT](#).

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.

In order to further mitigate and reduce risks we keep track of social audit reports on our suppliers (such as BSCI reports). 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.

Our suppliers are only permitted to use subcontractors after prior consultation and in observance with defined principles. We also strive for the greatest possible level of transparency here.

In the event of repeated violations of the OECD Guidelines or the ILO Core Labour Standards and unsuccessful measures we will responsibly terminate our business relationship.

COMPLAINTS PROCEDURE

Please let us know immediately if you have any concerns about the successful implementation of our Code of Conduct and contact us without delay about any 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
- Via the complaints channel of our sector initiative AMFORI BSCI: online complaint form: <https://www.amfori.org/content/amfori-external-grievance-mechanism>
- Whistleblower system and similar for our own employees: 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.

SUSTAINABILITY REPORT

In our Sustainability Report we report to the public on our business activities within our departments and along our global supply chain, and on the measures we take as part of our due diligence process.

We publish the Sustainability Report on our website.

IMPLEMENTATION AND ENFORCEMENT

The content of this Policy Statement can be publicly found on our website. 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 partners 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.

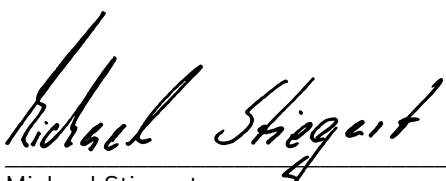
In terms of good corporate governance, we anchor the principles of responsible corporate governance in our strategic and operational management systems. We have created digitalisation and sustainability staff positions within the company to guarantee compliance with our commercial due diligence obligations.

We are aware that external influences and changing business activities may change the risks involved. We therefore continually monitor and update the risk assessment and the measures that are necessary as part of due diligence management. This allows us to continually evolve our sustainability management.

The Management Board of Paul H. Kübler Bekleidungswerk GmbH & Co. KG is responsible for the implementation of and adherence to this Policy Statement.

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Plüderhausen, 15/08/2023



A handwritten signature in black ink, reading 'Michael Stiegert', is written over a horizontal line.

Michael Stiegert
General Manager

Supplier



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Folgen Sie uns auf:



KÜBLER Workwear App:



Version 4 | 15/08/2023

KÜBLER
WORKWEAR

The logo features a stylized white arrow pointing to the right, positioned above the brand name "KÜBLER" in a bold, sans-serif font, with "WORKWEAR" in a smaller font below it.