



KÜBLER WORKWEAR

CODE OF CONDUCT

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CODE OF CONDUCT

We, the company Paul H. Kübler Bekleidungswerk GmbH & Co. KG, are committed to our social responsibility. Driven by our responsible awareness of the social, ecological and economic design of the entire value chain, we are facing up to the challenges of an increasingly networked and global economy.

Our Code of Conduct is based on the internationally recognized principles for the protection of human and labour rights as set out in

- The United Nations (UN) Universal Declaration of Human Rights
- The Sustainable Development Goals (SDGs) of the United Nations
- The UN Guiding Principles on Business and Human Rights
- The ILO core labor standards
- The United Nations Convention on the Rights of the Child
- The OECD Guidelines for Multinational Enterprises
- The Fair Wear Code of Labour Practices

In addition, our Code of Conduct is based on relevant international agreements on environmental protection.

With this commitment, we support the goal of enforcing and improving human rights, labor, social and environmental standards in economic value creation processes.

SCOPE OF APPLICATION

The principles and requirements set out in this Code of Conduct are binding for all employees of KÜBLER. In addition, we require our business partners and suppliers to comply with the principles described below or to implement equivalent standards and to ensure their effective implementation.

1. SOCIALLY RESPONSIBLE CORPORATE GOVERNANCE

Compliance with laws and regulations

We, KÜBLER, comply with the laws and regulations of the countries in which we operate. In particular in countries with weak state governance, we ensure that the principles set out in this Code of Conduct are upheld in our own activities and we encourage our business partners to do the same.

If national laws or regulations conflict with the provisions of this Code of Conduct, or if the domestic context makes it impossible to fully meet the responsibility to respect human rights, we will seek ways to uphold the principles of internationally recognized human rights and the requirements of this Code of Conduct to the greatest extent possible.

Contribution to society

We, KÜBLER, consider ourselves an integral part of the society in which we conduct our business activities. Through our business operations, we contribute to the well-being, advancement and sustainable development of society. We take into account both the direct and indirect impacts of our business activities on society and the environment and strive to balance these impacts in an appropriate economic, social and environmental manner.

We respect and acknowledge the differing legal, social, cultural and societal contexts of the countries in which our value chain operates, and we recognize their structures, customs and traditions. Where these are in conflict with the principles set out herein, we will engage in dialogue with our business partners and work towards mutual understanding and acceptance.

Ethical business conduct and integrity

We, KÜBLER, conduct our business activities in compliance with applicable laws and regulations, adhering to fair competition practices, the protection of third party intellectual property rights, and antitrust and competition law requirements. We reject all forms of corruption and bribery and actively promote the principles of responsible corporate governance, including transparency, accountability, responsibility, openness and integrity. Business partners are to be treated fairly.

Contracts shall be honoured unless the underlying conditions change fundamentally. General ethical values and principles must be respected at all times, in particular human dignity and internationally recognized human rights.

2. RESPECT OF HUMAN RIGHTS

The protection of human rights is the responsibility of the respective states in which we operate. In order to support the duty of states to enforce human rights within their territories, we, as KÜBLER, respect human rights. We seek to avoid causing or contributing to adverse human rights impacts through our own activities and to address such impacts where they occur.

To fulfil our responsibility to respect human rights, we apply appropriate human rights due diligence, taking into account the risk of severe human rights impacts as well as the nature and context of our business activities.

Human rights due diligence includes processes to identify, prevent, mitigate and, where appropriate, remediate potential adverse human rights impacts. It extends to adverse human rights impacts that we cause or contribute to, as well as those that are directly linked to our operations, products or services through our business relationships.

3. LABOR RIGHTS AND WORKING CONDITIONS

We, the KÜBLER company, follow the core labor standards of the International Labor Organization and create a safe and decent working environment.

Freedom of association and right to collective bargaining

We, KÜBLER, respect the right of workers and employers to establish and join organizations of their own choosing, without prior authorization, for the purpose of promoting and protecting the interests of workers or employers, and to freely elect their representatives. We respect the right of workers and employers to engage in collective bargaining over wages and working conditions.

Workers shall not be discriminated against or disadvantaged in their employment on the basis of their membership in workers' organizations. In this respect, we align our actions with the ILO core labour standards, in particular Conventions No. 135 and No. 143.

In countries where the principles of freedom of association, the right to organize and collective bargaining are not respected, or where the exercise of these rights is restricted or prohibited, we allow workers to freely elect their own representatives with whom they can engage in dialogue on workplace-related issues. We respect the right of our workers to raise complaints without fear of any form of retaliation; such complaints shall be addressed through appropriate procedures.

Prohibition of forced labor

We do not accept any economic activity based on forced or compulsory labour, debt bondage or servitude. This includes any work or service that is exacted from a person under the threat of penalty and for which the person has not offered themselves voluntarily, in accordance with ILO Core Labour Standards, Conventions No. 29 and No. 105.

Prohibition of child labor and protection of young workers

We, KÜBLER, are committed to the effective abolition of child labour (ILO Convention No. 182). We comply with the applicable legal minimum age for admission to employment or work, which, in accordance with the provisions of the International Labour Organization, must not be lower than the age at which compulsory schooling ends and must not be less than 15 years (ILO Convention No. 138).

As part of our recruitment and hiring processes, appropriate mechanisms for age verification are implemented to prevent child labour. If cases of child labour are identified, we will take the necessary remedial actions and initiate measures for social reintegration, placing the well-being and protection of the child at the centre of all actions. We employ young workers from the age of 16 only if the nature or conditions of the work do not jeopardise their health, safety or morals, and if they receive appropriate, job-related instruction or vocational training in the respective sector.

Prohibition of discrimination in employment and occupation

Any form of discrimination, exclusion or preferential treatment based on ethnic origin, skin colour, gender, religion, political opinion, national origin or social background that results in the denial or impairment of equal opportunities or equal treatment in employment or occupation shall not be tolerated, in accordance with ILO Convention No. 111. Furthermore, the principle of equal remuneration for men and women for work of equal value shall apply, in line with ILO Convention No. 100.

We treat our workers with dignity and respect. Any form of degrading treatment, including abuse, sexual harassment and gender based violence, is strictly prohibited. Disciplinary measures shall be documented in writing and communicated in a clear and understandable manner.

Working hours

Unless applicable national laws or collective bargaining agreements provide for a lower maximum, regular working hours shall not exceed 48 hours per week, plus a maximum of 12 hours of overtime per week. Overtime shall be compensated at least in accordance with applicable legal or collective bargaining provisions and must remain an exception.

We, KÜBLER, grant our workers the right to rest breaks on every working day and observe all applicable statutory public holidays. After six consecutive working days, at least one day off shall be provided. We align our practices with ILO Convention No. 1.

Remuneration

Minimum wages stipulated by law or collective agreements must not be undercut. We, KÜBLER, ensure that in countries without a statutory or collectively agreed wage framework, wages for regular full-time work are sufficient to meet the basic needs of employees (ILO Convention 26 and ILO Convention 131). At the same time, we recognize that KÜBLER alone cannot guarantee a livelihood consistent with human dignity, and that government support measures and other social protection systems may be necessary.

KÜBLER acknowledges the importance of living wages and, together with its partners, pursues the goal of promoting fair and responsible remuneration structures throughout the supply chain.

We aim to gain an overview of current wage levels by systematically collecting evidence of wages actually paid and comparing these with recognized published benchmark values. The objective is to work collaboratively, through trust-based dialogue with our partners and suppliers, to develop solutions that promote living wages and prevent financial exploitation of workers along our supply chain. Fairness and transparency are essential in this regard. 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 clearly indicated. Employees are regularly informed about the composition of their remuneration.

Employment relationships

The rules of national labour law must be complied with. Workers shall be provided with clear and understandable information on the essential terms and conditions of employment, including working hours, remuneration, and payment and payroll arrangements. A legally binding employment relationship is of central importance in this context.

KÜBLER protects the right of workers to terminate their employment relationship in compliance with the applicable notice periods. We also seek to promote the professional development and qualifications of our workers.

Occupational Health and Safety

We, KÜBLER, are committed to taking appropriate measures, considering national requirements, to ensure occupational health and safety in order to prevent work-related accidents and protect the health of our workers (ILO Convention No. 155).

All applicable local regulations on occupational health and safety, workplace safety, building safety and fire protection are complied with in order to minimize the risk of accidents and occupational illnesses. Where necessary and appropriate, workers are provided with suitable personal protective equipment (PPE). In situations of imminent danger, workers have the right and the obligation to leave their workplace immediately and without prior authorization. Vulnerable groups, such as young workers, young mothers and pregnant women, as well as persons with disabilities, are afforded special protection.

Access to Complaint Mechanisms

Employees have the right to submit complaints anonymously. Concerns regarding the effective implementation of our Code of Conduct, as well as serious violations of legal requirements and our values or standards, must be reported to us without delay by our business partners and their employees. For this purpose, we have established a contact point through which reports can be submitted to us, anonymously if desired.

In addition, external communication channels are available and are communicated internally as well as to our partners. Retaliation against people who raise concerns or report violations, including dismissal, discrimination or intimidation, will not be tolerated. We are committed to complying with our corporate due diligence obligations and to addressing every report received. Sensitive information is, of course, treated confidentially.

Employment of Security Forces

The use of private or public security forces to protect the company's own business activities should only take place on the condition that they are sufficiently trained and that there are no potential violations of human rights.

Subcontracting and Homeworking

Subcontracting by our suppliers is only permitted with prior approval and in compliance with the defined principles. Here, too, we strive for the highest possible level of transparency. Homework is generally not permitted.

4. PROTECTION OF ENVIRONMENT & WILDLIFE

We, 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 conduct our business activities in a manner that contributes to the overarching objective of sustainable development. KÜBLER expects itself and its partners throughout the value chain to handle resources and raw materials responsibly at all times. Waste is to be avoided, and continuous optimization of resource use, energy consumption, as well as the proper disposal and recycling of waste, is actively promoted. Compliance with applicable standards and environmental regulations is mandatory at all times. Our climate targets are defined within our management objectives, and we work continuously towards their implementation.

We therefore engage with external service providers to measure our annual CO₂ emissions with the aim of continuously reducing our environmental footprint. We also ensure the proper disposal of waste to minimize environmental impacts and to keep materials within the circular economy. We strive for continuous and long-term improvement of our environmental performance by promoting the introduction of appropriate technologies and production processes that enable the efficient use of natural resources. Accordingly, we aim to continuously reduce water consumption and water pollution, as well as to increase the share of environmentally friendly energy sources. Chemicals used throughout the production process are assessed through independent certifications and selected based on environmental, occupational health and consumer protection criteria; where particularly hazardous substances are identified, suitable alternatives are sought. We strictly comply with all relevant national and international legal requirements in this context.

In our business activities, KÜBLER also adheres to the principles of animal welfare. Animal husbandry and use must be carried out in a species-appropriate manner. We recognize the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and align our business practices accordingly to protect endangered animal and plant species.

5. CONSUMER INTERESTS

We, the KÜBLER company, take appropriate measures to guarantee the quality of the products we offer. We ensure that our products comply with all legal regulations regarding the health and safety of consumers and are safe and harmless to health for their intended use. KÜBLER also takes the interests of consumers into account in information and sales measures by applying fair business, marketing and advertising practices and promoting consumer education.

6. DATA PRIVACY & COMMUNICATION

We, KÜBLER, handle personal data with the utmost diligence to ensure compliance with the GDPR. The processing and transfer of personal data are carried out exclusively for lawful and business-related purposes. Confidential information belonging to KÜBLER as well as to its partners and its distribution must always be treated with the highest level of care. All employees are informed about the associated rights and obligations within the company and are sensitized to the proper handling of personal data. New employees are required to commit to the company's internal data protection policy; any changes to this policy are communicated internally to all employees, and additional training is provided.

The contents of the Code of Conduct are communicated to employees, contractual partners, and, where applicable, to third parties. It must be evident to contractual partners that compliance with the Code of Conduct is generally ensured. However, the disclosure of trade and business secrets, as well as competition-related or other sensitive information, is excluded from this requirement for legal reasons.

7. IMPLEMENTATION

We, KÜBLER, apply this Code of Conduct in our own business activities. We encourage our business partners to apply the principles of this Code of Conduct accordingly. We support our business partners in structuring their own supply chains in a way that respects human and labour rights and continuously improves working conditions. Compliance with this Code of Conduct constitutes a fundamental basis of our business relationships. In the event of violations, we work with our partners to implement corrective measures; in cases of repeated or serious violations, we reserve the right to take further appropriate actions.

In line with good corporate governance, we embed the principles of responsible business conduct set out in this Code of Conduct within our strategic and operational management systems.

Plüderhausen, 01.06.2026

A handwritten signature in black ink that reads 'R. Scheiner'.

Richard Scheiner
CEO

Signature supplier

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