

# CODE OF CONDUCT

## kintobe

Kintobe is a company that considers kindness as the answer. Kindness towards Earth as well as fellow human beings. We believe that to achieve sustainability the effort includes both our environment and the way we exist with each other. We want a kinder and more accepting world. More openness and human connection, so we can thrive and collaborate on solving our shared challenges.

We cannot solve these challenges ourselves. We need our suppliers to be on the same page as us. Kintobe is on a journey to make this happen, catching up with the ever-evolving world of responsibility, and taking active steps towards driving positive change.

This Code of Conduct describes the ethics that Kintobe wishes to promote. We wish to ensure that our products are produced under legal, safe, and responsible conditions of all employees in our supply chain. Hence, the Code of Conduct applies to every level of our supply chain from extraction to factory, including all subcontractors and sub-suppliers. We expect that our suppliers will request their supply chain to comply with these requirements and transparency.

Transparency implies openly exchanging information to timely identify any challenge that requires mitigation when developing, implementing, and sustaining specific policies and standards of this Code, likewise when reporting improvements. We expect our suppliers to inform all subcontractors, hence hidden factories are not accepted. All production locations must at all-time be transparently informed and kept updated. Furthermore, it entails involving and informing workers on the ongoing processes regarding implementing the Code and hand out copies of the Code and specific policies within the present requirements.

Kintobe and appointed third-party quality checkers or audits must always be granted access to all facilities, relevant documents, and employees. All suppliers are evaluated against the standard of the Code.

We therefore encourage you to consider your level of compliance within each of the ethical guidelines throughout the Code of Conduct.

Based on your own evaluation we wish to collaborate and interact with you. Collaboration and transparency are essential to our relationship with all our suppliers and a key to credibility. This principle aims to ensure a joint approach as well as an open and transparent dialogue on the standards of this Code of Conduct.

We prioritise those suppliers who are committed to demonstrating transparency, compliance, and continued improvements.

***We cherish partners who speak their minds with an open heart.***

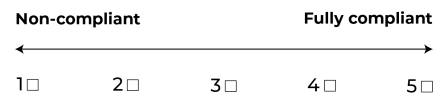
# ETHICAL GUIDELINES

Our ethical guidelines are based on internationally agreed conventions, including but not limited to: the International Labour Organisation's (ILO) Declaration of the Fundamental Principles and Rights at Work, the 8 elements of Fair Wear's Code of labour practices, the OECD Guidelines for Multinational Enterprises, the Amfori BSCI principles, and the UN Global Compact's ten principles highlighting important challenges tied to the environment, corruption, workers', and human rights. Our commitment implies having in place policies and processes for preventing and addressing adverse impacts on the following requirements:

## 1. Human and Labour rights

### 1.1. FORCED LABOUR

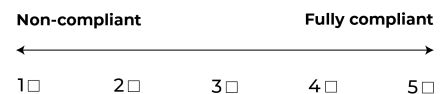
Employment must be freely chosen. Suppliers must not use or support any form of slavery, forced, or bonded labour.



- This principle aims to protect all workers within the supply chain from recruitment fees or deposits, lodging of personal documents by the employer, or forced overtime. Business partners shall ensure that workers are not subject to inhumane treatment, corporal punishment, or any form of abuse. Workers are hired based on documented contracts according to law.
- Business partners will risk allegations or complicity if they benefit from the use of such forms of labour.
- Before entering employment, business partners are to provide workers with clear and understandable information about their rights, responsibilities, and employment conditions in a language they understand.
- All disciplinary policies must be established in writing.

### 1.2. CHILD LABOUR AND YOUNG WORKERS

Child labour is not permitted and special protection to young workers must be enforced.

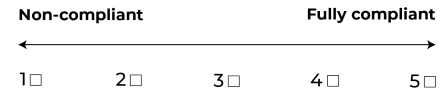


- This principle aims to protect children from any form of exploitation. Suppliers must establish age-verification mechanisms as part of the recruitment process, which may not be in any way disrespectful to the worker.
- Suppliers must not use child labour below the age of 15, even if permitted by national law. All legal limitations regarding young workers between the age of 15 and 18 must be followed and young workers are only permitted to carry out light work at reduced hours. This means that they must be protected from any hazardous work, night shifts, and any kind of work that might hamper their physical and psychological development or impose any harm. Further, their working hours must not prejudice their attendance at school or their capacity to engage in training programs.

- Special care is to be taken on the dismissal of children, as they can move into more hazardous employment, such as prostitution or drug trafficking. In removing children from the workplace, business partners should identify in a proactive manner, measures to ensure the protection of affected children.

### 1.3. EMPLOYMENT LETTERS

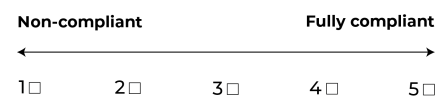
All employees have legal and understandable employment letters in place.



- This principle aims to protect all employees, including temporary and casual workers, right to legal employment letters, specifying conditions and termination and written in a language they understand.
- Employment letters must follow international conventions and social security laws and regulations and not be avoided by using short-term contracts, such as contract labour and casual labour.

### 1.4. WAGES

Employees receive a fair wage.



- This principle aims to respect the right of workers to receive fair wages. Suppliers must provide a fair living wage, implying that wages are enough to provide a decent living for workers and their families. Further, wages and benefits must be paid regularly and in a timely manner and not be withheld.
- Wages for a standard working week must at a minimum meet the legal minimum wage, industry standards or collectively bargained wages, whichever is higher.
- Real wage growth must be continually monitored, and deductions are only permitted if and to the extent prescribed by law or fixed by a collective agreement. Deductions may not be used as a disciplinary practice.
- All overtime work must be compensated at a premium rate which is recommended to be no less than 125% of the regular pay rate.

### 1.5. WORKING HOURS AND LEAVE

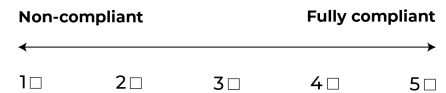
Decent working hours and all types of leave comply with local regulations.



- This principle aims to ensure that standard working hours and leave of all matters follow local regulations, collective bargaining agreements, and industry standards. Standard working hours must not exceed 48 hours per week, excluding overtime.
- All overtime must always be consensual and not requested on a regular basis. Weekly overtime must not exceed 12 hours.
- Employees must have daily breaks and be allowed a minimum of 1 day off per week and paid annual leave. Maternity leave, sick leave, and other types of leave must be provided to all employees in accordance with relevant local regulations.

## 1.6. NO DISCRIMINATION AND HARASSMENT

Discrimination against workers is not permitted.  
Gender equality, diversity and equal opportunities are actively promoted.



- This principle aims to ensure that discrimination in recruitment and in employment are prevented and that all workers are treated with respect and dignity. Decisions about hiring, compensation, access to training, advancement, discipline, termination, or retirement must be solely based on the ability to perform the job and not on the grounds of gender, marital or parental status, pregnancy, race, caste, colour, age, sexual orientation, religion, political opinion, union membership, function as worker representative, nationality, ethnic origin, health status, or disability.
- Suppliers must at all times prevent the use of bullying, intimidation, violence, threats of violence, corporal punishment, or physical, sexual, psychological, and verbal harassment or abuse. Procedures to ensure punitive measures in cases of harassment or discrimination must be put in place.
- Special measures must be put in place to protect all workers against gender-based violence and harassment in the workplace.

## 1.7. FREEDOM OF ASSOCIATION

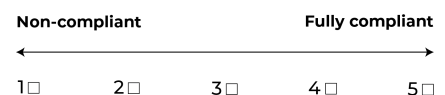
The right of workers to form associations, unions or engage in collective bargaining in a free and democratic way is respected.



- This principle aims to protect the worker's right for association and collective bargaining. Suppliers must respect the rights of workers to join and organise associations in a free and democratic way and to bargain collectively with no interference or sanctions from employers.
- Workers' representatives shall have access to workers in the workplace or from interacting with them.
- The supplier must implement mechanisms, such as worker participation committees, for resolving disputes, a grievance mechanism and ensure effective communication with employees and their representatives.
- If the rights to freedom of association and collective bargaining are restricted by national law, the supplier must allow workers to freely elect their own representatives, and alternative forms of worker representation must be supported.

## 1.8. ETHICAL BUSINESS BEHAVIOUR

High ethical standards are enforced, and any acts of corruption, extortion, or bribery are not tolerated.



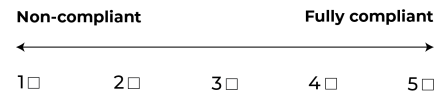
- This principle aims to ensure that suppliers act according to high ethical standards with integrity in all matters related to their business.
- Corruption, extortion, kickbacks, facilitation payments, or bribery must not be offered, received, or promised.

- Suppliers should collect, use, and otherwise process personal information from workers, business partners, customers, and consumers with reasonable care and respect of privacy.

## 2. Working Conditions

### 2.1. OCCUPATIONAL HEALTH AND SAFETY

A safe and hygienic working environment must be provided for all employees.



- This principle aims to ensure that decent work is safe by preventing work-related accidents and injuries and promoting a healthy and safe work environment.

#### 2.1.1. Working Environment and Safety

- Management representatives for health and safety and/or procedures on incident and risk must be in place. Safe working conditions for all employees are ensured and dangerous working practices are not permitted.
- Buildings are safe and healthy and all relevant certificates and material regarding building safety should be kept for review. Adequate air circulation, windows, fans, air-conditioning, radiators as well as light for different work-related activities are installed and ensured. Safe electrical installations are handled and maintained by competent personnel.
- Employees always have access to clean drinking water as well as sanitary facilities.
- Company-provided dormitories, restrooms and other sanitary, changing rooms, and canteen meet basic needs and uphold appropriate standards on hygiene, health, and safety.
- All machines are equipped with operational safety devices and inspected and maintained regularly. Safety gloves, masks, and other protective equipment is available to employees and provided by the supplier, free of charge. Personal protective equipment (PPE), free of charge and in good condition, against damages to hearing, sight, inhalation is always provided and training in the proper use of the PPE is conducted.
- The frequency of work accidents is monitored, and statistics are kept.
- Special measures must be put in place to ensure a gender-sensitive approach.

#### 2.1.2. Fire and First Aid

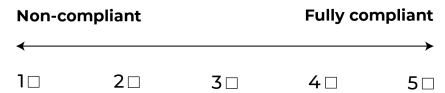
- Passages, stairways, exits are always unobstructed and main exits never locked during working hours. Indication of location of escape routes is clear and adequate equipment for fire safety is available.
- Fire alarms are placed in each production unit and regularly checked and maintained.
- A fire drill is held at least once a year. Employees are educated on fire safety and evacuation while several employees are trained for proper use of fire extinguishers and on providing first aid on spot.
- At least one regularly updated and well-stocked first aid kit is placed in each production unit.
- Procedures for the handling of serious accidents that require treatment outside the production unit are in place by the supplier.

#### 2.1.3. Handling Chemicals

- Hazardous and/or toxic chemicals should be avoided and substituted with less harmful alternatives.
- Health and safety training on handling hazardous and/or toxic materials and chemicals and informing employees about the consequences of working with them must be conducted. Special training is given to workers in direct contact with the substances.
- Hazardous and/or toxic substances are stored safely in locations that are adequately ventilated. Handling of these materials is done safely.
- Procedures in case of accidents involving chemicals are completed and available. \*

## 2.2. WORKERS INVOLVEMENT AND PROTECTION

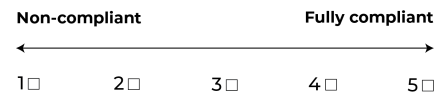
Workers are informed about their rights and responsibilities while competencies are continuously developed.



- This principle aims to ensure that workers and their representatives are well informed, protected, and educated regarding workplace issues. Specific steps to make workers aware of their rights and responsibilities must be established.
- Continuous training at each level of work is essential, particularly regarding health and safety as well as competency development must be conducted.
- It is encouraged that all employees are educated on social and environmental sustainability through mandatory training programmes.

## 2.3. GRIEVANCE MECHANISM

Suggestions and complaints from all employees are collected and addressed.

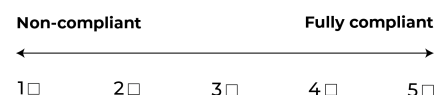


- This principle aims to ensure that a way to report breaches in a confidential manner is provided.
- Suppliers must have a grievance mechanism in place allowing all employees to voice their concern if they find that operations of the supplier are adversely affecting human and labour rights, environment, and ethical business.
- The grievance mechanism should be appropriate to the size and resources of the company and can take the form of a whistle-blower function, worker representation committee, anonymous reporting hotline e.g.
- The grievance mechanism should be widely communicated and accessible to all workers (including temporary workers), and managed in a confidential, unbiased, timely, and transparent manner to protect workers when complaints and grievances are reported in good faith.

# 3. Environment and Resources

## 3.1. WATER RESOURCES

All operations take necessary measures to support water conservation, water quality, and wastewater.

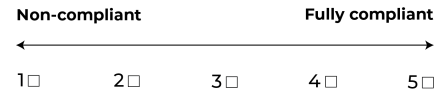


- This principle aims to support that the use of water during production throughout the supply chain is minimised and done as minimum according to the local environmental laws and regulations.
- Measures must be put in place to clear wastewater and to manage water consumption.

- Suppliers must work towards minimising the use of water during production processes, including introducing water saving techniques and waste-water recycling. This is particularly pertinent for suppliers with wet processing.
- It is encouraged that suppliers work towards measuring the impact of their operations on the local/regional water supply to avoid negatively contributing to water stress.

### 3.2. ENERGY EFFICIENCY

All operations take necessary measures to support energy efficiency and the use of renewable energy sources if accessible.



- This principle aims to support mitigating negative impacts on climate change.
- Suppliers must work towards implementing energy efficiency measures in the value chain, starting with high-impact processes, and using renewable energy sources if available.
- Suppliers must work towards calculating emissions and setting targets to reduce the emissions using recognized standard-setting-tools.

### 3.3. CHEMICALS

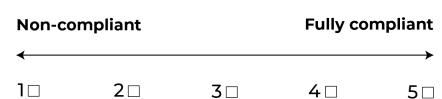
All operations must comply with latest international restrictions.



- This principle aims to ensure that all suppliers conduct their operations in accordance with the following requirements on chemicals:
  - The [European Union REACH Regulation \(EC\) No 1907/2006 Annex XVII](#) and later amendments.
  - The “substances of very high concern” (SVHC) i.e. the [European Union REACH Regulation \(EC\) no. 1907/2006 Candidate List](#). Suppliers are requested to check the list on a regular basis as this list is continuously updated.
  - The [Manufacturing Restricted Substances List \(MRSL\) developed by the initiative Zero Discharge of Hazardous Chemicals \(ZDHC\)](#).
  - Country specific regulations on export markets.
- Local laws must be followed in the storage, handling, use, and disposal of all chemicals and must comply with the Material Safety Data Sheet (MSDS) for each chemical product.
- An account of the chemical composition of dyes and coatings used in production must be available and the supplier is expected to ask for a declaration of the content of dyes and coatings from the suppliers. Any specifications submitted by the supplier of dyes and coating should be verified by an internationally recognized laboratory.
- The content of chemicals in processed garments and goods is controlled by lab tests required by Kintobe. All suppliers must follow test methods.

### 3.4. WASTE MANAGEMENT

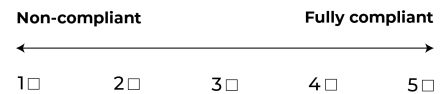
All waste is responsibly managed and reduced.



- This principle aims to ensure that all waste is managed responsibly and as a minimum according to applicable regulations.
- Suppliers must work to improve resource efficiency e.g. by implementing cleaner production techniques and reducing waste during production processes.
- Suppliers must at best implement methods for reuse or recycling of waste. Waste collection for reuse, reduction of the use of virgin raw materials, and optimisation of the use of re-cycled materials and fibres must all be facilitated. The goal should be no waste to landfill.
- Hazardous waste and/or toxic substances must be handled by an authorised company/organisation in accordance with applicable law.
- Suppliers should keep detailed records on resource consumption as well as waste production and emissions to ensure effective monitoring. This information must always be available to Kintobe on request.

### 3.5. MATERIALS

All materials used in production aspire to be 100% recycled and not animal derived.



- This principle aims to reduce the use of virgin materials.
- All recycled materials are obligated to preferably have a valid GRS or RCS certification.
- Recycled materials must be made from traceable post and pre industrial plastic waste or natural waste not suitable for higher level of utilisations.
- Suppliers must make sure there are no animal derived materials used during the production process ( eg.: glue ).

## SUPPLIER COMMITMENT

We trust that our suppliers and business partners will embrace and commit to using reasonable endeavours to achieve the present requirements set out in this Code of Conduct. Kintobe believes that achieving ethical, healthy, and environmental standards is a process, and we are committed to working together with our suppliers and business partners in their efforts.

In those instances where a supplier needs to improve certain procedures and practices, the supplier must be committed to do so within a specific timeframe that we agree together.

In countries where domestic laws and regulations conflict with or set a different standard of protection than the Code of Conduct, business enterprises should seek ways to abide by the principles that provide the highest protection to the workers and environment.

Although considered a last resort, lack of commitment and willingness to engage and improve on co-developed policies and standards of this Code, will result in termination of the business relationship.

Seeing this Code of Conduct as a process and working tool for continued improvements is essential. Developing, implementing, and sustaining policies within each requirement is a process that takes considerable time, resources, and effort. Gaps, failures, and



unpredictable occurrences will always remain a possibility. All business partners commit strongly to monitoring and remedying all such failures in their supply chains and remaining transparent and open to constructive engagement and collaboration.

BEFORE you sign, we would like you to reach out to us at Kintobe to have a dialogue based on your level of compliance and feedback for improvements of this Code of conduct.