

STIEGLITZ CODE OF CONDUCT

STIEGLITZ is committed to the highest standards of ethical conduct, and social and environmental responsibility. Our goal is to create timeless pieces for generations to be worn, over and over again. Meanwhile, leaving the lowest possible impact on our planet and environment. We believe in the empowerment of women, and preserving natural and cultural heritage. To accomplish our goals we depend on the relationships we have with our partners throughout our supply chain. We seek partners who share our values and visions of female empowerment, preservation of nature, cultures, transparency, and continuous improvement. STIEGLITZ suppliers must provide safe working conditions, treat workers with dignity and respect, and conduct business in a fair and ethical manner at all locations from which they supply products or perform services for STIEGLITZ. To ensure that all STIEGLITZ products are produced in this manner we have this Code of Conduct which applies to all stages of the supply chain.

The STIEGLITZ Code of Conduct (hereafter also referred to as ‘the Code’) sets out the **fundamental requirements** that STIEGLITZ’s suppliers, their subcontractors, and sub-suppliers are required to meet as part of the terms and conditions of trading with the brand. In addition to the fundamental requirements, we encourage all our suppliers to work towards the **advanced principles** in this Code of Conduct. We believe that a strong focus on continuous improvement of the principles outlined in this Code of Conduct will ultimately benefit all parties and strengthen our relationships.

The STIEGLITZ Code of Conduct is based on, and refers to;

- United Nations (UN) Universal Declaration of Human Rights
- International Labour Organization (ILO) Conventions and Recommendations
- UN Guiding Principles on Business and Human Rights (UNGPR)
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector

Suppliers are required to comply with all (local) laws, administrative obligations, standards, rules, and regulations relevant to their business. If and when local law and the Code of Conduct differ or conflict, we expect suppliers to apply the highest standard.

TRANSPARENCY

Transparency is vital to improving working conditions and environmental impact in the supply chain and is, therefore, a fundamental part of our business relationships. We require suppliers to commit to being transparent within the context of identification, prevention, and remediation of adverse human rights and environmental impacts. For verification and audit purposes we require transparency from suppliers into their operations, procedures, records, and subcontractor locations. Suppliers may not intentionally mislead, provide inaccurate or falsified information, or hide non-compliances. Non-transparency is regarded as a violation of this Code of Conduct. If suppliers or their subcontractors can not meet any of the requirements of this Code of Conduct this needs to be communicated to STIEGLITZ immediately.

Supply chain traceability is essential to ethical business conduct and we ask our suppliers to be transparent about the locations and circumstances at all production locations, factories, and subcontractors involved in making STIEGLITZ products.

Fundamental: Transparent supply chain

We require our suppliers to provide accurate information when requested on:

- All production locations linked to STIEGLITZ, including direct factories, subcontractors, sub-suppliers, and homeworkers. Including full company name, address (of the actual production locations), and contact person.
- Information about operations and processes at all production locations.
- Material transparency and traceability: the country of origin of the raw materials.
- All administration, certification, and proof of complying with (local) legislation and regulations.

- Energy and emissions data.
- From 2023 onwards, we expect our suppliers to map and continuously track and monitor all locations in the supply chain linked to STIEGLITZ and provide information when requested into the own and/or subcontracted factories, mills, plants, farms, and other sites, from material source to final manufacturing.

Advanced: Compliant supply chain

We request our suppliers to provide accurate information when requested on:

- The latest valid (BSCI) audit report and Corrective Action Plan (CAP).
- Company policies or management systems on social and environmental compliance including water, chemicals, energy, and emissions.
- Information on memberships, assessments, and/or certifications that provide insight into (advanced) sustainability efforts.

PEOPLE

To promote human rights across our supply chain and business operations, we require all suppliers involved in making STIEGLITZ products to comply with the following requirements and principles.

FORCED LABOUR AND MODERN SLAVERY¹

Fundamental: Employment is freely chosen

All types of work within the STIEGLITZ supply chain should be freely chosen. STIEGLITZ does not accept any form of involuntary or forced labour at any stage of the supply chain. All work must be conducted on a voluntary basis and not under threat of any penalty or sanction.

Companies must respect the rights of all workers and employees:

- Suppliers must not use any form of forced or compulsory labour; prison labour, indentured labour, bonded labour, or labour obtained through human slavery or human trafficking.
- Workers shall always be in possession and full control of their identity papers and work permits.
- Workers shall not be required to make monetary deposits to their supplier or recruitment agency.
- Suppliers must not hold any portion of workers' salaries or property on grounds of threat or any other reason.
- All workers must be allowed to leave the premises freely and terminate their employment at any time with reasonable notice.

Fundamental: Complying with the Modern Slavery Act

The UK Modern Slavery Act was enacted in 2015 to create more transparency throughout supply chains to uncover modern slavery and human trafficking. STIEGLITZ is fully committed to identifying, preventing, and mitigating modern slavery in our supply chain and we ask our suppliers to:

- Provide audit reports or proof of certification that covers labour standards including forced labour and modern slavery.

Advanced: Obtain GoodWeave certification

Suppliers are recommended to obtain GoodWeave certification. The GoodWeave label is an assurance to prove that no child, forced or bonded labor was used in the making of a product, and includes a program to educate children and improve working conditions. <https://goodweave.org/about/goodweave-label/>

DISCRIMINATION²

STIEGLITZ has a zero tolerance approach to discrimination, meaning that discrimination in whichever shape or form is not accepted in the STIEGLITZ supply chain.

¹ ILO Conventions 29 and 105, ILO Recommendation 35.

² ILO Conventions 100, 111, 143, 158, 159, 169 and 183, ILO Recommendations 90, 111 and 168.

Fundamental: There is no discrimination in employment

Every worker must be treated with respect and dignity at all times. No distinction, exclusion, or preferential treatment shall be made based on personal characteristics that result in unequal treatment or opportunity in any area of employment.

- Suppliers shall not practice any discrimination in hiring, salary, benefits, access to training, promotions, termination, or retirement.
- Suppliers shall not discriminate on the grounds of race, caste, nationality, ethnic origin, religion, age, colour, social origin, disability, disease, gender, marital status, sexual orientation, political affiliation, health status, pregnancy, union membership, work or personal affiliations, or any other basis that could give rise to discrimination.

Advanced: Gender equality

The majority of people working in fashion supply chains are women. Suppliers should demonstrate and promote gender equality in pay, benefits, and other areas of employment. People of any gender performing the same or equal work in the same form of employment must receive equal pay and treatment and must have equal opportunities in promotion, advancement, and training. We ask suppliers to provide information upon request about:

- The number of workers, specified per gender and per position.
- Payment specifications for workers of all genders, in the same function and form of employment.

STIEGLITZ also encourages gender-balanced management teams and programs and training to enhance women's empowerment and rights. Please share any relevant information with STIEGLITZ.

CHILD LABOUR AND YOUNG WORKERS³

STIEGLITZ maintains a zero-tolerance policy on child labour. Child labour is prohibited by law and is not accepted in the STIEGLITZ supply chain.

Fundamental: No exploitation of child labour

Child labour is strictly prohibited in any part of the supply chain and under any circumstance.

Suppliers must have effective verification processes in place to ensure that all workers:

- are at least the minimum age for employment established by law in the given country and;
- shall not be younger than the age of completion of compulsory schooling and;
- in any case, shall not be less than 15 years⁴

Necessary measures must be taken to ensure that no one under the legal age of employment is recruited. If any child is found to be performing work in the workplace, the supplier must develop, or participate in programs that provide transitional arrangements and enable them to attend and remain in quality education until no longer a child.

Fundamental: Protection of young workers

All legal limitations regarding the employment of persons below the age of 18 must be followed. Suppliers must have effective mechanisms to prevent, identify and mitigate harm to young workers.

- Young workers may not be involved in any hazardous work, night shift, excessive overtime, economic exploitation, and any kind of work that might hamper their development or compromise their safety, health, or morals.
- Where young workers are employed, suppliers must ensure that their working hours do not obstruct their attendance at school, and young workers should have access to effective grievance mechanisms and to Occupational Health and Safety training and programs.
- If any young workers (below the age of 18) are employed, STIEGLITZ needs to be notified and proof needs to be provided that all requirements relating to the employment of young workers are followed.

³ ILO Conventions 10, 79, 138 and 182, ILO Recommendations 146 and 190

UN Convention on the Rights of the Child
The Children's Rights and Business Principles

⁴ Exceptions under ILO Convention 138 apply

Advanced: Young workers

Young workers may need to work to provide enough income for their families. If this is the case, inform STIEGLITZ about the situation. We feel no underaged child should be required to work for the livelihood of their family and adults working at our suppliers should receive wages that are sufficient to meet the basic needs of themselves and their families and provide some discretionary income. See living wage.

Advanced: Community engagement

Suppliers are encouraged to actively engage with local communities and stakeholders to promote education and solutions to address child labour and young workers.

Advanced: Obtain GoodWeave certification

Suppliers are recommended to obtain GoodWeave certification. The GoodWeave label is an assurance to prove that no child, forced or bonded labor was used in the making of a product, and includes a program to educate children and improve working conditions. <https://goodweave.org/about/goodweave-label>

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING⁵**Fundamental: Freedom of Association and the right to collective bargaining**

Suppliers must acknowledge and respect the right of all workers, without exception or distinction, to form or join associations, organisations, or unions of their own choice as well as the right to bargain collectively for the purpose of promoting and protecting the interests of the workers. Workers should not be subjected to punishment, intimidation, discrimination, retaliation, termination, or harassment due to the exercise of their right to join, leave, or refrain from joining any organization, or due to their union activities. Where the right to freedom of association and collective bargaining is restricted under local law, the supplier encourages and does not hinder the development of other forms of independent and free association and bargaining.

Fundamental: Workers' representatives

Workers should be allowed to freely elect their own representatives with whom the company can enter into dialogue about workplace issues. Worker's representatives are not discriminated against and shall be granted the ability to carry out their representative functions in the workplace.

Advanced: Promoting social dialogue

The supplier engages on a regular basis with worker representatives to facilitate, promote and participate in social dialogue. The supplier engages directly with local and regional trade unions to proactively address issues of concern to the workforce and is a member of a suppliers' association.

FAIR WAGES AND BENEFITS⁶**Fundamental: Legal wages and benefits**

Suppliers must comply with all applicable laws and regulations relating to wages, benefits, overtime compensation, and paid leave. Wages and benefits must meet, at a minimum, national legal level, industry level, or collective bargaining agreement, whichever is higher. Wages must be paid regularly and in full. The details of the wage for a pay period must be provided in written and understandable form. Deduction from wages as a disciplinary measure is not permitted.

Suppliers shall provide information upon request about:

- Wage levels and if the wages paid to all workers comply with the legal minimum wage, industry level, collective bargaining agreement level, or living wage level.

Suppliers must ensure that all workers receive all benefits and compensations as required by law or contract, including but not limited to holidays, sick leave, maternity leave, legal benefits, healthcare, parental care, and child care. Workers must be compensated for overtime hours at a premium rate as legally required, which is recommended to be not less than 125% of the regular rate of pay. Piece-rate work shall not be exempted from the right to overtime compensation.

⁵ ILO Conventions 87, 98, 135 and 154, ILO Recommendations 135 and 143

⁶ ILO Conventions 26, 131 and 183, ILO Recommendation 135

Advanced: Living wages

Suppliers should pay all workers a fair living wage that is sufficient to meet the basic needs of Workers and their families, and provide some discretionary income. Suppliers are encouraged to engage with local and international organisations to determine the local cost of living and if needed amend the wage structure to allow for the payment of living wages. The supplier ensures that worker surveys are regularly conducted in order to understand if the wage paid meets the workers' basic needs.

WORKING HOURS⁷**Fundamental: Protection from excessive overtime**

Working hours, as well as overtime hours, must be defined in contracts and shall comply with national law or collective agreements, whichever affords greater protection for workers.

- Ordinary working hours shall not exceed the legal limit and never exceed 48 hours per week.
- Workers are provided with at least one day (24 hours) off for every 7-day period.
- Overtime hours shall not exceed the time allowed by national law and never exceed 12 hours per week. The total hours in any 7-day period shall not exceed 60 hours.
- Workers shall not on a regular basis be required to work in excess of 48 hours per week.

Overtime shall be voluntary, workers shall not be punished, intimidated, retaliated, terminated, harassed, or discriminated against if they decline. Suppliers shall clearly communicate working hours on the contract at the beginning of the employment relationship.

Advanced: Mitigating excessive overtime

The supplier ensures that there is an effective system in place to measure and monitor production plan, capacity and output in order to avoid overtime hours. Open communication about capacity and planning with STIEGLITZ is encouraged to maintain good production planning that does not cause excessive overtime.

HEALTH & SAFETY⁸**Fundamental: Safe and healthy working conditions**

Suppliers shall provide a safe and hygienic working environment free from risk of injury or threat to the health and well-being of workers, bearing in mind any industry-specific hazards. Compliance with applicable laws and regulations regarding occupational health, safety, and risk protection. Where domestic legislation is weak or poorly enforced, suppliers shall comply with international standards. Best occupational health and safety practices must always be pursued. Suppliers must take adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising the cause of hazards inherent in the working environment, including:

- No unsafe buildings.
- No unsafe exposure to hazardous machines, equipment, and/or substances.
- Fire Safety shall be maintained through adequate equipment and facility conditions, regular firefighting training and evacuation drills, and prevention of fire hazards. Evacuation plans and firefighting equipment must be in place.
- Emergency exits must be clearly marked, well-lit, and unblocked all the way out of the building. Evacuation through emergency exits must always be possible during working hours.
- Workers shall receive regular and recorded health and safety training. Relevant first aid equipment must be available and, where legally required, a doctor or a nurse should be available during working hours.
- Suppliers shall provide Personal Protective Equipment (PPE) to all workers free of charge.
- There is access to adequate and safe drinking water and clean, working toilet facilities.
- Adequate lighting, ventilation, and temperature are provided.
- Accommodation/Housing, when provided, must be separated from the workplace and is subject to all fundamental requirements concerning health and safety.
- Separate accommodations and toilets are provided for women and men.
- Measures should be in place to accommodate the needs of pregnant workers.
- Suppliers shall implement effective procedures and training to prevent accidents and minimise health risks.

⁷ ILO Conventions 1, 14, 106 and 30, ILO Recommendation 116

⁸ ILO Conventions 155 and 183, ILO Recommendations 164 and 191

HARASSMENT AND ABUSE⁹

Harassment and abuse are not accepted in the STIEGLITZ supply chain. STIEGLITZ maintains a zero-tolerance policy on sexual harassment and abuse in particular.

Fundamental: No harsh or inhumane treatment

Suppliers must treat all workers with respect and dignity at all times. Harassment, violence, or abuse, being of physical, sexual, psychological, verbal, or any other nature is strictly prohibited, as is humiliation or corporal punishment, intimidation, or coercion. Suppliers shall not use intimidatory practices to maintain discipline and productivity in the workplace. Any penalties or disciplinary measures may only be taken in line with current national and international standards and shall follow internationally recognized human rights. Suppliers shall implement strict measures to prevent any form of harassment, violence, and abuse in the workplace.

Fundamental: Fostering a safe and positive environment

The supplier is encouraged to adopt an effective complaints mechanism and appoint or hire a confidential counsellor for workers to safely and anonymously address concerns and violations of their rights, without fear or risk of retaliation.

LEGAL EMPLOYMENT¹⁰

Fundamental: Legally-binding employment relationship

All work performed must be on the basis of a recognized employment relationship that respects workers and safeguards their rights and is established through national and international regulations and laws. Suppliers must provide to all workers a written contract, in the local language, outlining the employment terms and conditions.

The supplier has a responsibility to ensure that all workers are aware of their legal rights and obligations. Obligations to workers, under labour or social security laws, shall not be avoided using labour-only contracting, fixed-term contracts, or apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

Fundamental: Foreign contract workers

Foreign contract workers or 'migrant workers' shall have the same rights and entitlements as local workers. Suppliers shall ensure that foreign workers hold a legal work permit or visa, as required by law. Migrant workers must not be subject to any form of forced, compulsory, bonded, or indentured labour and may not be required to submit their identification documents. No worker should pay for their work or right to work. When recruitment agencies are used, all fees and costs must be paid by the supplier. Deposits, deductions from wages, or reimbursements to recoup recruitment fees are not permitted to be obtained from workers.

The supplier has a responsibility to ensure that all migrant workers are aware of their legal rights and obligations. All employment contracts must be written in the worker's language. Workers employed through an agent or contractor are the responsibility of the supplier and are thus covered by this Code of Conduct.

GRIEVANCE MECHANISM¹¹

Fundamental: Effective grievance mechanism

Workers must be permitted to safely and anonymously address concerns and violations of their rights, without fear or risk of retaliation. Suppliers shall have an effective complaints or 'grievance' mechanism in place enabling workers to put forward complaints and is set up according to the following criteria:

- Affected stakeholders (workers, workers' representatives, and trade unions or organisations) are involved in the design of the mechanism.

⁹ ILO Convention 190

¹⁰ ILO Conventions 122, 158, 175 and 143

ILO Recommendation 166

¹¹ OECD due diligence guidance for responsible supply chains in the garment and footwear sector.

- The access person for the grievance mechanism must be suitable for the job and trustworthy. More than one point of access to the mechanism should be provided.
- Allow for complaints to be made anonymously to avoid fear or risk of retaliation.
- Escalation to local mechanisms should be possible.
- The grievance mechanism should be known, easily understandable, and accessible to all workers (regardless of language or literacy).
- Every complaint is treated seriously, complainants are kept informed of the status, and outcomes are implemented in agreement with the complainant.
- The mechanism should seek to resolve grievances through dialogue between the enterprise and the affected party or their representatives.

PLANET

STIEGLITZ is committed to mitigating environmental impacts across our supply chain and business operations. We, therefore, require all suppliers involved in making STIEGLITZ products to comply with all relevant local and national environmental protection laws and regulations and aim to meet international environmental protection standards. Ongoing efforts should be made to prevent and mitigate environmental burdens.

CARBON & EMISSIONS

Fundamental: Complying with laws and regulations

Suppliers must conduct all operations in full compliance with all applicable laws and regulations on air quality, air emissions, and energy efficiency, including maintaining valid permits.

Advanced: Reduce carbon emissions

STIEGLITZ recognizes the crucial role that fashion supply chains play in climate change and we commit to reducing GHG emissions to meet the climate targets of the Paris Agreement. We ask suppliers to actively mitigate its impacts on climate change and air quality by:

- Adopting continuous improvements in energy management and efficiency in buildings, production processes, and transportation methods.
- Reducing or eliminating Greenhouse Gases (GHG) and other air emissions that pose a hazard to the environment and the climate.
- Calculating emissions, and setting science-based targets.
- Sharing carbon reduction targets and the progress towards those targets upon request.
- Taking a progressive approach towards adopting lower-carbon-intensity and renewable energy sources by moving away from coal and selecting energy sources responsibly.

CHEMICALS

Fundamental: Complying with laws and regulations

STIEGLITZ requires all suppliers to be in full compliance with all applicable laws and regulations regarding chemical use and disposal, including maintaining valid permits. All chemicals used for goods, products, materials, and components that are purchased or manufactured for STIEGLITZ need to comply with the European REACH regulation, whether production is done outside or inside Europe. Storage, handling, use and disposal of all chemicals used must comply with the Safety Data Sheet (SDS) of each chemical product.

Suppliers shall not release any hazardous and toxic chemicals or untreated water directly in the environment. Suppliers shall take all the relevant measures to prevent harmful or hazardous chemicals from ending up in nature, water, air, or goods. Hazardous waste is to be collected by an authorized company and dealt with responsibly.

Fundamental: Using better chemicals

Any chemicals used in the supply chain should be free of hazardous substances. Supplier proactively informs STIEGLITZ if hazardous chemicals are (commonly) used in products, materials or processes that are being manufactured, developed or sourced for STIEGLITZ. Supplier assesses its chemical use and where possible phases out harmful substances and substitutes with better available chemicals and alternative processes which reduce the risk of impacts to people and the environment.

Advanced: Using 'green' chemistry

Suppliers are encouraged to seek out best practices for all chemicals involved in any part of the production of STIEGLITZ products. This includes the use of biodegradable substances and 'vegetable' dyes and should always be aimed at reducing risks to people and the environment and enhancing resource efficiency: reducing waste and emissions and conserving energy and water.

WATER**Fundamental: Water Use and Treatment**

STIEGLITZ requires all suppliers to be in full compliance with all applicable laws and regulations on water conservation and water quality, including maintaining valid permits. Facilities with internal wet processing shall measure water withdrawals and wastewater discharge by flow metres and facilities with full internal treatment of wastewater shall ensure that all outgoing wastewater is treated before it is discharged and meets the requirements in local legislation on water quality or the BSR Wastewater Standard, whichever is stricter.

Fundamental: Water-stressed communities

Suppliers shall implement appropriate measures to reduce water usage and support local solutions in water-stressed communities. Suppliers shall measure water use and source water from water-stressed areas responsibly, by promoting water efficiency and/or reducing process dependence on fresh water.

Advanced: Water reduction

Suppliers take proactive measures to reduce water use and show continuous reduction of the supplier's water withdrawals. For suppliers using water only for domestic purposes (taps, toilets, etc) ensure the implementation of water-efficient equipment and wherever possible, apply water-saving techniques such as rainwater harvesting. Inform STIEGLITZ if any water reduction measures are in place in any facility.

WASTE**Fundamental: Waste Management**

Suppliers shall have a waste management policy in place in full compliance with all applicable laws and regulations, including maintaining valid permits. Hazardous waste must be taken care of in a responsible manner and in accordance with local law. Where services are available, all hazardous waste must be handled by an authorised company or licensed receiver. Non-hazardous waste must be separated for appropriate recycling.

Advanced: Minimise waste and virgin raw material use

Suppliers should reduce their use of virgin raw materials and minimise waste by showing continuous improvement in optimization of raw material usage, increasing recycling, reusing, and reintegrating of raw materials.

BIODIVERSITY**Fundamental: Conservation of species**

STIEGLITZ requires all suppliers to be in full compliance with all applicable laws and regulations including maintaining valid permits. Raw materials must not include species that are listed on the Convention on International Trade in Endangered Species (CITES), the Endangered Species Act (ESA) and the International Union for Conservation of Nature's Red List as Critically Endangered, Endangered or Vulnerable.

Fundamental: Deforestation

Suppliers shall comply with all local laws and regulations on responsible forest management. Suppliers are expected to follow responsible forestry practices for all wood-based raw materials (including cellulosic materials), and other materials that may be the cause of or contribute to deforestation. Wood-based materials that originate from ancient or endangered forests, vulnerable or endangered species of trees, leather originating from illegally deforested areas or the Amazon Biome,

or materials that are illegally harvested or harvested in violation of traditional and civil rights are not accepted.

Fundamental: Traceability and certification

When requested, suppliers must be able to provide STIEGLITZ with transparent information about the origin of raw materials that could fall in this category. Materials originating from countries with tropical rainforests or ancient and/or endangered forests are only permitted if Forest Stewardship Council (FSC) or other relevant proof or certification can be provided.

Fundamental: Responsible sourcing of wood-based materials

All wood-based materials (including paper and cellulosic materials such as viscose) should be derived from pulp coming from sustainably-managed forests and suppliers must provide Forest Stewardship Council FSC certificate upon request.

Advanced: Promoting biodiversity

Suppliers are encouraged to source natural raw materials that are third-party verified to ensure more sustainable farming and forestry practices, including organic, organic in transition farming practices, and regenerative agriculture.

RESPONSIBLE MATERIALS

Fundamental: Responsible sourcing

STIEGLITZ is committed to responsible sourcing all raw materials and components used in our products, and that social and environmental impacts are considered during the sourcing process. We, therefore, expect suppliers who source materials, components, or feedstocks for any STIEGLITZ products to prioritise credible and verifiable socially and environmentally responsible practices. Upon request, suppliers should provide supporting documentation and certifications

Fundamental: Banned materials

STIEGLITZ has banned the following materials due to high risks of negative social, environmental, or animal welfare impacts. Suppliers must agree to not use these materials and chemicals in STIEGLITZ products in any process at any stage:

- Fur
- Angora and Mohair
- Skins of animals solely killed for their fur or leather
- Exotic Skins or feathers from wild or endangered animals
- Down and feathers from live plucking
- PVC (Polyvinyl Chloride)

ANIMAL WELFARE

Fundamental: Animal husbandry

The use of material originating from animals must be sourced with respect to the animal's welfare. Suppliers must conduct all operations in full compliance with all applicable laws and regulations including maintaining valid permits. Suppliers must ensure that the Five Freedoms, and the Five Provisions & Welfare Aims are respected as a standard for animal welfare. This includes the provisions of; nutrition, environment, health, behaviour, and mental state.

Fundamental: No mulesing

In the case of wool, no mulesing techniques are accepted. Suppliers must adhere to this and provide proof of non-mulesing upon request.

Fundamental: Traceability of animal-derived materials

We expect suppliers to provide information about the animal-derived materials used, including any relevant documentation or certification as proof of good animal welfare practices. For all animal-derived materials, suppliers must be able to provide:

- Species name
- Country and region of origin
- If applicable: proof of compliance or certification

Aspirational: Pursuing best-practices

Suppliers are encouraged to actively pursue best practices in their supply chain for good animal husbandry. Sourcing raw materials verified by a third-party animal welfare certification program and sourcing recycled inputs as a replacement for virgin animal-derived materials is encouraged.

SUBCONTRACTING

STIEGLITZ is committed to transparency across our supply chain and understanding where STIEGLITZ products are sourced and produced, from raw materials to manufacturing. We aim to maintain strong relationships with all our suppliers throughout our supply chain, including with any subcontracted facilities, sub-suppliers, and homeworkers (henceforth referred to in this Code as 'subcontractors').

If a supplier wishes to work with subcontractors for any part of the manufacturing of STIEGLITZ products, they must notify and get written permission and consent from STIEGLITZ prior to any production taking place at the proposed subcontracted facility. All subcontractors are required to sign and comply with the STIEGLITZ code of Conduct. It is the responsibility of the supplier to ensure that all subcontractors receive, sign, and comply with this Code, and suppliers are required to continuously monitor approved subcontractors for social and environmental responsibility using standards from this Code.

ETHICAL TRADE

No bribery or corruption

STIEGLITZ is committed to acting ethically, professionally, fairly, and with integrity in all our business dealings and relationships. Bribery, corruption, extortion, embezzlement, fraud, or other forms of lawfully unethical business practices are strictly prohibited. Suppliers and workers must comply with all applicable anti-bribery and corruption laws and suppliers must have measures in place to prevent offences of corruption or bribery.

Whistleblowing policy

Any supplier, worker, business relation, or other external parties can raise a concern or complaint to STIEGLITZ directly, in addition to through the grievance mechanisms suppliers must have in place. All complaints or grievances will be treated sensitively, and taken seriously and there will be no retaliation against any individuals or organisations who raise concerns. Confidentiality shall be respected and maintained, where appropriate. Any concerns or non-compliances can be addressed via roderick@stieglitz.nl

OUR COMMITMENT

STIEGLITZ recognizes that as the company at the head of the supply chain, our behaviours have an effect further down the chain. We, therefore, ask suppliers to inform us if our actions influence their ability to meet the standards outlined in this Code and we commit to the following:

- Continuously working to improve our policies and practice to enable our suppliers to meet their commitments as outlined in our Code of Conduct.
- Treating our suppliers with respect and consideration in all our dealings and communications.
- Communicating clearly, promptly, and accurately on all issues concerning orders.
- Committing to paying suppliers in line with the agreed timeframe.
- Never negotiate a price that is below the cost of production, as this will impact the wages and working conditions of the workers.
- Staying with our current supplier if a higher price will ensure decent wages and working conditions for workers, rather than moving our business elsewhere purely on the basis of price.
- Placing orders with lead times that do not trigger excessive working hours or subcontracting.
- Improve dialogue with strategic suppliers to balance volumes through peaks and troughs.

- Refraining from changing orders repeatedly and with short notice. If changes are unavoidable, amending deliveries accordingly.
- Providing material and practical support to our suppliers in striving to meet their obligations under our Code of Conduct.
- Sharing the cost of implementing and monitoring improvements in working conditions.
- Taking pay and working conditions of workers into consideration when reviewing our business relationship, rather than ending a business relationship purely on the grounds of price or quality.
- Aiming for long-term working relations with our suppliers.
- Following responsible exit strategy protocols in the event of the termination of a working relationship with a supplier.

IMPLEMENTATION, VERIFICATION, AND REMEDIATION

We require that all STIEGLITZ suppliers and their subcontractors fully comply with the STIEGLITZ Code of Conduct. Suppliers shall implement, and integrate this Code of Conduct into their operations and ensure awareness of the Code among all their workers and subcontractors. Suppliers shall ensure that all subcontractors receive, sign, implement and comply with the Code. When necessary, suppliers will ensure the Code is translated into the appropriate language.

To ensure that the Code is being implemented, STIEGLITZ may organise assessments and third-party audits at supplier locations. If any violations of the Code are found, the supplier shall improve or rectify the violation(s) through immediate action using documented procedures and strategies. Corrective Action Plans as a result of a third-party audit need to be executed within the given timeframe. The supplier shall provide STIEGLITZ with documents that show evidence of all remedial actions and results.

If at any time, the supplier becomes aware of a violation of the Code, in any part of the supply chain, the supplier must immediately notify STIEGLITZ and disclose any details that are necessary to accurately assess the non-compliance.

We expect suppliers to work according to the continuous improvement principle. However, when a supplier fails to undertake required improvements within the stipulated time frame this will seriously damage its relationship with STIEGLITZ. Unwillingness to cooperate or repeated serious violations of this Code and/or legislation may lead to reduced business and ultimately to possible termination of the business relationship with STIEGLITZ.

STIEGLITZ is committed to working collaboratively with suppliers and where possible, will provide guidance and support to suppliers working to adopt more sustainable and responsible practices.

For any advice, questions, feedback, disclosures, or whistleblowing please contact:
roderick@stieglitz.nl

SUPPLIER COMMITMENT

As a business partner to STIEGLITZ, we commit to complying with the **fundamental requirements** outlined in this Code of Conduct, and implementing them in our operations as well as aiming to realise compliance with the requirements throughout our supply chain.

Furthermore, we understand that STIEGLITZ aims to continue to grow and strengthen business relations with business partners that share STIEGLITZ's commitment to the highest standards of ethical conduct, and social and environmental responsibility beyond compliance with the law, stated as **advanced principles** in this Code of Conduct.

Therefore, as a business partner to STIEGLITZ, we agree to be monitored and evaluated on our social and environmental performance within the areas outlined in this Code of Conduct.

DEFINITIONS

Biodiversity: All the different forms of life in one area - the variety of animals, plants, fungi, and microorganisms that make up the natural world. Each of these species and organisms work together in ecosystems, to maintain balance and support life.

Child labour: Any work performed by a person below 15 years of age or below the local minimum age of mandatory schooling, whichever is greater. Exceptions under ILO Convention 138 apply.

Collective bargaining: The process of negotiation between employers and a group of employees aimed at agreements to regulate working salaries, working conditions, benefits, and other aspects of workers' compensation and rights for workers.

Deforestation: The removal of a forest or stand of trees from land that is then converted to non-forest use. Deforestation plays a role in climate change as trees naturally absorb carbon.

Forced labour: All work which is exacted from any person under the threat of a penalty and for which the person has not offered themselves voluntarily.

Freedom of association: The right of workers and employers to form and join organisations of their own choosing.

GHG emissions: Greenhouse gas emissions from human activities strengthen the greenhouse effect, causing climate change. The most common GHG is carbon dioxide (CO₂) from burning fossil fuels: coal, oil, and natural gas.

Grievance mechanism: a grievance mechanism is a formalised means through which individuals or groups can raise concerns about the impact an enterprise has on them – including, but not exclusively, on their human rights – and can seek remedy.

Hazardous work: Work which by its nature or the circumstances in which it is carried out, has the potential to harm the health and safety of people. This includes handling chemicals or harmful substances, working with heavy machinery or electrics, working in confined spaces or underground or under water, working at height or in extreme temperatures, being exposed to dusty environments, fumes or loud noise, lifting heavy loads or strenuous work, working excessive hours, working overtime or working at night.

Homeworker: Any person whose employment is predominantly carried out in their home or in other premises of their choice, other than the workplace of the supplier.

Living wages: The wage received for a standard work week by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transportation, clothing, and other essential needs including provision for unexpected events.

Migrant worker: Any person working in a region different to their region of origin.

Mulesing: Mulesing is a procedure during which strips of skin around a lamb's breech and tail are cut with shears, often without any pain relief. This painful procedure is practised in Australia to avoid Myiasis (Flystrike).

Subcontracting: The practice of assigning, or outsourcing, part of the obligations and tasks under a contract to another party known as a **subcontractor**.

Modern slavery: Modern slavery is defined as the recruitment, movement, harbouring, or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.

Personal Protective Equipment (PPE): Equipment worn to minimise exposure to hazards that cause serious workplace injuries and illnesses. These injuries and illnesses may result from contact with chemical, radiological, physical, electrical, mechanical, or other workplace hazards. Personal protective equipment may include items such as gloves, safety glasses and shoes, earplugs or muffs, hard hats, respirators, or coveralls, vests, and full-body suits.

Traceability: This refers to the ability to trace products and their components back through each step of the supply chain, all the way to raw materials. For true traceability to be achieved, a brand would need to know where the raw materials (ie. cotton) comes from, what conditions their products are made in, and every step in between.

Young worker: Any worker over the age of 15 or over the local minimum age of mandatory schooling, whichever is greater, but under the age of 18.