

Code of Conduct

Edition:
March 2022

minimum

moves

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CHANGE LOG

March 2022: Second Edition

INTRODUC- TION

What began as a standalone retail store in Aarhus, Denmark back in 1997 has since developed into an independent fashion brand. With a mission of designing accessible fashion, the first male collection was launched in 1999, and in 2007 Minimum expanded and introduced a female line, focusing on contemporary design and high quality. Ever since, the collections have been refined while paying great attention to the minimalistic signature of Minimum. With an unpretentious and transeasonal approach to fashion, Minimum has become the synonym to effortless fashion that can be worn season after season. Today the brand is internationally represented among 1.200+ point of sales throughout Europe, Israel, and Canada.

This COC and all policies included in the appendices, applies to the brands owned by MINIMUM A/S, hereby Minimum and Moves.

The MINIMUM A/S COC and policies is coherent with our own internal approach to and work with responsible business conduct.

This COC also comes with a promise of cooperation and partnership to do better – together. MINIMUM A/S's suppliers and partners can trust that our conduct and purchasing practices will not undermine but rather strengthen our and their opportunity to deliver on our requirements related to people, society, and the environment.

OUR RESPONSIBILITY

MINIMUM A/S wish to exercise responsible business conduct in respect of all people, society, and the environment around us. We recognize that this work starts in our own business and with our own practices, but to fully succeed we need to work in close partnership with our suppliers and business partners. In transnational and complex supply chains, collaboration is a prerequisite to exercise responsible business conduct, and to realize the UN Sustainable Development Goals.

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GENERAL PRINCIPLES

This COC ¹reflects the values of MINIMUM A/S and is based on the Universal Declaration of Human Rights and the UN Global Compact. The UN Global Compact contains 10 principles, covering the areas Human Rights, Labour, Environment and Anti-Corruption. The 10 Principles of the United Nations Global Compact arise from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption.

When signing this COC we wish for our suppliers to commit to the same principles.

Working to implement these principles is a long and challenging process, but MINIMUM A/S kindly requires all our suppliers to join us in working actively with implementation and due diligence in their own business. All such efforts will be acknowledged as part of the foundation of a strong business partnership.

SCOPE

The requirements of this COC extend to all factories producing MINIMUM A/S products and all their workers working within those factories, regardless of their status or relationship with the supplier. This COC therefore also applies to workers who are engaged informally, on short-term contracts or on a parttime basis.

Where there are differences between the terms of this COC and national laws or other applicable

standards, suppliers shall adhere to the higher requirements. If conflicts between national law and this COC are detected, suppliers must inform MINIMUM A/S immediately.

CASCADE EFFECT

Further to supplier's own business, this COC also applies to operations carried out by direct suppliers, sub-contractors, or other partners. It is supplier's responsibility to inform the requirements of this COC to all their direct suppliers and sub-contractors involved in or connected to MINIMUM A/S's productions and any processing of our products.

The cascade effect of the COC is requested to assure that all factories and workers involved in the MINIMUM A/S supply chain, also beyond tier ¹² are informed about our requirements on responsible business conduct and are able to make the necessary improvements and address any non-compliance.

¹ COC will be referred to as COC in the entire COC.

² tier 1= garment manufacturer

DUE DILIGENCE: MANAGING RISKS IN YOUR BUSINESS AND YOUR SUPPLY CHAIN

International guidelines call on businesses to exercise due diligence to detect, prevent, and mitigate any adverse impacts related to human and labour rights, the environment, including climate, and anticorruption. These procedures are required for all groups, individuals, and entities that a business may impact, within all business and production units, the local community, and the external environment.

Key steps of the due diligence procedures include developing policies within all relevant potential and actual impact areas in the business, such as health and safety, environmental protection and chemical management, and anti-corruption. Such policies must be communicated to all employees and other relevant stakeholders.

Further, procedures as well as a proper management system must be developed to ensure that policies, including this COC and its¹ appendices, are implemented, and followed, and thereby ensuring that any potential and actual negative impacts are prevented and mitigated. A management system entails:

- Having a centrally placed employee responsible for the implementation of the COC in the supplier's business.
- Performing own due diligence and periodic risk assessments and self-assessments of all production units and sub-suppliers.
- Making the COC known in all relevant parts of its organization, in a language understood by the organization.

- Refraining from disciplining, dismissing, or otherwise discriminating against any employee for providing information concerning observance of this code.
- Maintaining appropriate records to demonstrate that the requirements of this COC are followed, being transparent, providing reasonable information and access to MINIMUM A/S and/or parties approved by MINIMUM A/S seeking to verify conformance.
- Having an appropriate grievance mechanism in place allowing stakeholders to voice their concern if they find that operations of the supplier are adversely affecting human and labour rights, environment, including climate, anti-corruption, and animal welfare.

TRANSPARENCY

Transparency is essential for MINIMUM A/S, to work towards a more sustainable supply chain and as part of this it is essential for MINIMUM A/S that suppliers show transparency and provide information on their production units to MINIMUM A/S upon request. This requirement is applicable for all types of suppliers to MINIMUM A/S, be it agents, export/import companies or factories with single or multiple sites.

The information must be reconfirmed on a regular basis and/or when changes occur.

See Appendix A for information Factory Unit Mapping to be filled out and shared with MINIMUM A/S at start of cooperation and in case of any changes along the cooperation.

GRIEVANCE MECHANISM

A central element to responsible business management is a well-functioning grievance mechanism. A grievance can be defined as any concern, unhappiness, or discontent that a worker might have in the workplace.

A grievance mechanism is a non-judicial procedure that offers formalized means through which individuals or groups can raise concerns about the impact a business enterprise has on them – including, but not exclusively, on their human rights – and can seek remedy. These mechanisms may use adjudicative, dialogue-based, or other processes that are culturally appropriate and rights-compatible.

PROCEDURE

Suppliers are encouraged to apply the following procedure but may also choose their own format. At a minimum, the grievance mechanism procedure should ensure that workers have:

- Access to their supervisor: The possibility to hold an open and constructive meeting about a grievance with their immediate supervisor or manager can prevent escalation of the problem.
- Access to raise a grievance about her/his own supervisor or manager to another person, who will then be in charge of the grievance mechanism.
- The possibility of raising a grievance anonymously if any fear of repercussions.
- Access to support: Workers should have the right to be accompanied by a fellow worker of her/his own choice, or by a union representative (for unionized facilities), when attending a meeting to discuss a grievance. Access to support can make workers more comfortable with the process.
- The right to appeal: An escalation channel to a more senior manager to challenge a decision made by their supervisor or manager can add impartiality.

Following steps should be taken in cases of grievances from workers:

- STEP 01: Acknowledge Grievance
- STEP 02: Analysis
- STEP 03: Mediation 8
- STEP 04: Closing and Publication
- STEP 05: Appeal

COMPLAINTS FROM LOCAL COMMUNITY

Suppliers should ensure that local community members are aware of their rights and the related channels to lodge grievances. Suppliers may have separate procedures to receive and handle grievances from the local community. If such procedure is not available, the steps described above for worker grievances, as well as the grievance form, may be valid/applicable to address grievances from local communities.

MONITORING AND EVALUATION

Suppliers must assign responsibility to one or more management representatives with the responsibility and authority to ensure compliance with this COC. Suppliers shall maintain appropriate records to demonstrate compliance with the requirements of this COC. Records shall be available to MINIMUM A/S upon request.

All production sites shall be open to audits at any time if requested by MINIMUM A/S. In the case where we require an audit of the site, we may be represented by an independent third-party auditing company of our choice.

MINIMUM A/S encourages all our suppliers to enroll in relevant audit and/or certification programs and will support their process whenever we can. Documentation of social and environmental compliance through audit programs and certification is an important parameter in our assessment of

overall supplier performance.

MINIMUM A/S recognizes various programs. For example:

- Amfori BSCI
- Sedex SMETA
- SAI SA8000

REMEDIATION

Where instances of non-compliance are detected during audits and/or supplier visits, suppliers will be given a fixed period to remediate the findings. In the event of failure to remediate, MINIMUM A/S is willing to engage in a constructive dialogue with suppliers to develop and implement action plans with appropriate time scales for implementation and improvements to be achieved.

MINIMUM A/S does not operate with a passed/failed policy and terminating a business relationship will only be the last instance. However, MINIMUM A/S will not conduct business with a supplier if compliance with the terms of this COC is deemed impossible and the supplier shows no willingness or ability to improve. If the supplier is willing to work with us on continuous improvements, MINIMUM A/S is also willing to work with the supplier.

ZERO TOLERANCE

Human rights violations and business behavior that may endanger the independence of an audit will be distinguished from regular social performance findings and qualify as zero tolerance cases. Examples of zero tolerance findings cover, but may not be limited to:

- Workers who are younger than 15 years old (or the legal minimum age defined by the country)
- Workers younger than 18 who are subjected to forced labour
- Not allowing workers to leave the workplace or forcing them to work overtime against their will
- Using violence or the threat of violence to intimidate workers to force them to work
- Inhumane or degrading treatment, corporal punishment (including sexual violence), mental or

physical coercion, and/or verbal abuse

- Occupational health and safety violations that pose an imminent and critical threat to workers' health, safety, and/or lives
- Attempted bribery of auditors
- Intentional misrepresentation in the supply chain (e.g. hiding production sites, lacking a business license, and purposefully under-declaring the size of the workforce)

ZERO TOLERANCE PROTOCOL

In the event, that a Zero Tolerance is detected during an audit or a site visit, MINIMUM A/S will engage with relevant stakeholders to handle the situation urgently and professionally. The supplier is obliged to participate in and support all necessary investigation, remediation, and training. In case of unwillingness to remediate, MINIMUM A/S reserves the right to terminate the relationship and cooperation.

THE MINIMUM A/S REQUIRE- MENTS

The following requirements cover the labour standards as well as very basic environmental standards that suppliers working with MINIMUM A/S must strive to achieve at their factories and worksites. This COC is based on the Universal Declaration of Human Rights and key UN and ILO conventions. The requirements draw on the Danish Textile Industry COC, and they reflect international standards and conventions protecting workers' rights and human rights, as described under the General Principles section. All suppliers must comply in their best effort with these requirements and must be committed to address minimum requirements and move beyond.

MINIMUM REQUIREMENTS

MINIMUM A/S will only cooperate with suppliers and worksites that demonstrate compliance and progress on the following minimum requirements:

01. The factory only employs workers who are over the legal minimum age of the respective country.
02. Factories do not use forced, bonded or involuntary labour

03. Workers are not forced to lodge unreasonable deposits or their identity papers with their employers.
04. Workers are not subject to physical abuse, the threat of physical abuse, verbal abuse or any other forms of intimidation.
05. There must be an adequate number of safe, unblocked fire exits, escape routes and firefighting equipment accessible to workers from each floor or area of the factory and accommodation (if provided).
06. The factory is a safe and hygienic place to work.
07. Dormitory, if provided, is safe and hygienic, and is segregated from the factory or production area and from material storage areas.
08. The factory does not knowingly disobey local and national environmental legislation without being able to demonstrate a plan of action to improve.
09. Factory management demonstrates a willingness to improve on any significant areas of concern identified and is committed to working towards meeting the standards of the COC.

See also appendix B for the Minimum A/S Human Rights Policy.

Following paragraphs specifies the above listed minimum requirements and focus areas, and what conditions and standards MINIMUM A/S expect to meet in all our suppliers' worksites.

MINIMUM A/S will work in partnership with suppliers and factories, industry partners and authorities in a process of continuous improvement to ensure that these standards are met over time.

CHILD LABOUR AND YOUNG WORKERS

To respect and abide by the principle of 'Child Labour and young workers', suppliers should have sufficient management systems in place to ensure that no children under 15 years of age are working in production units producing for Minimum A/S. If the law states a higher age, then this must be followed. Young workers under the age of 18 may only perform light work and only within normal working hours. This means that they must not be exposed to work that is harmful to their morals or health, dangerous to life, or likely to hamper their normal development. Suppliers must comply with all local laws concerning young workers.

Minimum A/S Child Labour Policy should be signed upon beginning of cooperation and followed in cases where child labour is found in the supply chain. See also appendix C

NO FORCED LABOUR

To respect and abide by the principle of 'No forced labour', suppliers must not use forced, prisoned or illegal labour in any of our supplier's production units. Workers shall not have to leave any sort of deposit and/or ID/passport when hired by the factory. The worker shall always sign a contract upon beginning work at the factory. The contract shall be written in a language that the worker understands. The worker has the right to terminate the employment according to national law. Overtime should be always voluntary. Workers should have free access to toilets, water and praying rooms at all times if/when necessary. Suppliers must ensure that all feasible

measures are taken to prevent workers from falling into debt bondage through company loans.

NO PRECARIOUS EMPLOYMENT

To respect and abide by the principle of 'No Precarious Employment', suppliers must:

- A. Ensure that the nature of their workers' employment do not give cause to any lack of security, nor any social or economic vulnerability for the respective workers.
- B. Ensure that workers' employment is properly documented in form of a recognized and valid contract. The nature of the employment and the documentation thereof must follow national laws, customs or practice as well as international labour standards, depending on whichever that provides greater protection. Before entering into employment, suppliers must provide workers with understandable information about their rights, responsibilities and employment conditions, including working hours, remuneration and terms of payment.

Suppliers should aim at providing decent working conditions that support workers, women as well as men, in their roles as parents or caregivers. This is especially in regard to migrant and seasonal workers whose children may be left in the migrants' hometowns.

Suppliers shall not exploit special forms of employment without any intent to following the general purpose of the respective law linked to the form of employment. This includes, but is not limited to:

- A. Apprenticeship or internship schemes where there is no intent to provide any training or development of skills for the worker or any intent

of providing regular employment subsequently.

- B. Seasonality or contingency work when used to undermine workers' protection.
- C. Labour-only contracting.

restricts unions, the supplier should encourage and not prevent the formation of worker committees, from which workers have the opportunity to, collectively express their grievances directly to the management.

NO DISCRIMINATION AND HARASSMENT

To respect and abide by the principle of 'No discrimination and harassment', suppliers must ensure that workers shall never be discriminated in relation to race, color, caste, nationality, religion, gender, age, sexual orientation, or marital status. The supplier must ensure that policies are in place to prevent any form of harassment and discrimination in the factory.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

To respect and abide by the principle of 'Freedom of association and collective bargaining', suppliers should recognize the right of workers to join, form or not to join trade unions of their choice without fear of intimidation, reprisal, or harassment. The supplier should engage in collective bargaining with legally recognized employee representative. When law

WORKING HOURS AND COMPENSATION

Suppliers must ensure that, working hours should always be kept within the limits of national law but no higher than 60 hours per week, including overtime hours. Workers should receive at least one rest day in a 7-days period. Workers should be free to refuse overtime without fearing contract termination or punishments. All national laws regarding compensation of workers, should be kept. Maternity leave, sick leave, and other types of leave must be provided to all employees in accordance with relevant local regulations.

Withholding of wages for any reason is not allowed. Workers should be given at least the national minimum wage, and this should be enough to meet the basic needs of the workers. Pay slips must always be signed and handed over to the respective worker. National law on social insurances must be kept at all times.

OCCUPATIONAL HEALTH AND SAFETY

To respect and abide by the principle of human rights, suppliers must ensure that the following subjects are followed.

MANAGEMENT SYSTEM

The supplier should have sufficient management systems in place to ensure that health and safety of the workers are never compromised in any decisions taken. The supplier should conduct periodic risk assessments to ensure that all risks are managed and that there is no risk to human life or risks that can cause serious accidents.

SAFETY

The working environment should be safe, healthy, and clean at all times and all working stations shall be provided with sufficient lighting. Relevant first aid equipment must be available and where legally required a doctor or nurse should be available during working hours.

FIRE SAFETY

All local laws regarding fire safety must be kept, and all facilities producing for Minimum A/S must as a minimum install adequate warning systems, fire safety equipment and well-marked exits and escape routes. Fire escapes should be clear for passage and must not be locked or blocked at any time. Fire drills must be conducted on an annual basis. Suppliers shall ensure that safety precautions in regard to the use, storage and handling of chemicals are taken.

Supplier shall ensure, that electrical installations are according to law and does not pose a risk to fire safety in the production facility.

CHEMICAL HANDLING

All chemicals and hazardous materials must be safely handled, transported, and disposed of according to law. Workers should be trained in handling chemicals and should always be provided sufficient protective

equipment when handling these. MSDS (Material Safety Data Sheet) should be provided for all chemicals on site.

DORMITORIES, KITCHENS, AND DINING ROOMS

Dormitories must be placed in buildings separate to the production building. Dormitories must have sufficient living and storage space for workers. Workers must have easy access to food or sanitary food storage, clean water and toilet/bathing facilities. Dormitories, kitchens, and dining areas must take all required health and safety as well as fire safety precautions.

ENVIRONMENTAL PROTECTION

To respect and abide by the principle of 'Environmental protection' MINIMUM A/S expects all our suppliers, as a minimum requirement on environmental protection, to comply with all applicable national, regional, and international environmental laws and regulations. To ensure, that water is used responsibly, and disposal of wastewater should be according to the law. Monitor all emissions that are produced during production in accordance with applicable legislation. And handle and disposal of solid waste in a responsible way in accordance with applicable legislation.

See also appendix D, for more detailed requirements.

ANTI-CORRUPTION

MINIMUM A/S is committed to adhere to the UN Convention Against Corruption and we expect the same commitment from our suppliers. To respect and abide by the principle of 'Anti-corruption', suppliers shall work against corruption in all forms. Suppliers should establish adequate processes to avoid corrupt practices. Such processes should support and be in line with the United Nations Convention against Corruption.

See also appendix E, for more detailed requirements.

ANIMAL WELFARE

MINIMUM A/S products deriving from animals, shall be produced with the highest regard to the welfare of the animals. Suppliers shall ensure that animals are treated according to the Five Animal Freedoms.

See also appendix H, for more detailed requirements.

RESPONSIBLE PRODUCTS

MINIMUM A/S is dedicated to developing and market quality products, which are produced in a responsible and as sustainably possible way, both for the people involved and the surrounding environment. Suppliers are encouraged to pursue relevant certifications and to document all their initiatives to improve their own production and sourcing practices.

See also appendix F, for more detailed requirements.

CHEMICALS

It is supplier's responsibility that any product supplied to MINIMUM A/S is free of prohibited substances and chemicals beyond the legal limits.

See our Chemical Restrictions in Appendix G for more detailed requirements.

SIGNATURE

If any need for further information or elaboration on above, please do not hesitate to contact us. It is important to MINIMUM A/S that you as our supplier and valued business partner take part in this effort to establish and maintain responsible and sustainable business practices by complying with these requirements.

When signing this page, you agree to adhere to the Code of Conduct of MINIMUM A/S, including all appendices listed below:

- Appendix A: Factory Unit Mapping
- Appendix B: MINIMUM A/S Human Rights Policy
- Appendix C: MINIMUM A/S Child Labour Policy
- Appendix D: MINIMUM A/S Environmental Policy
- Appendix E: MINIMUM A/S Anti-corruption Policy
- Appendix F: MINIMUM A/S Ethical Sourcing Requirements
- Appendix G: MINIMUM A/S Chemical Requirements
- Appendix H: MINIMUM A/S Animal Welfare Policy

Name of Supplier:

Name:

Date:

Signature

Thank you so much!
We appreciate your cooperation.

APPENDIX A: FACTORY MAPPING

To ensure transparency in our supply chain, it is important for us and for our customers, that we know where our products are being made. The information will only be used to trace our products and will under no-circumstances be used against you. Should we find any discrepancies between our requirement and the conditions at the factories, it will be dealt with in a close dialogue with you and not used as an excuse to stop our cooperation.

The data will be stored in our company, and we ask you to update on a six-months basis if any changes have been made to the information you will fill in below.

We are always available for questions and/or concerns, so please do not hesitate to reach out at any time.

Name of Agent/Supplier:	
Address:	
Country (office):	
Name of Contact Person:	
Email of Contact Person:	
Phone number of Contact Person:	
Type of Product Supplied to MINIMUM/MOVES:	

PRODUCTION UNITS

Please provide name and addresses of the production units you use for our products:
(We will not contact the factories directly without your consent and/or knowledge)

If the factory has a valid audit report (such as BSCI, Sedex, SMETA, WRAP or similar), please attach it with this document, to avoid an audit from our side. Please make sure that the audit report is valid.

If you as a supplier has a valid certificate (such as GOTS, GRS, OEKO-TEX, or others), please attach it with this document. Please make sure that the certificate is valid.

UNIT 1	UNIT 2	UNIT 3
Name:	Name:	Name:
Address:	Address:	Address:
Country:	Country:	Country:
Type of Product (ex. female shirts /pants):	Type of Product (ex. female shirts /pants):	Type of Product (ex. female shirts /pants):
Please list the process at this factory (ex. dyeing / printing / sewing):	Please list the process at this factory (ex. dyeing / printing / sewing):	Please list the process at this factory (ex. dyeing / printing / sewing):
Social audits conducted in the factory:	Social audits conducted in the factory:	Social audits conducted in the factory:
Please inform if any certifications (such as GOTS / GRS / RWS):	Please inform if any certifications (such as GOTS / GRS / RWS):	Please inform if any certifications (such as GOTS / GRS / RWS):
Please list which other brands are produced in the factory:	Please list which other brands are produced in the factory:	Please list which other brands are produced in the factory:

UNIT 4	UNIT 5	UNIT 6
Name:	Name:	Name:
Address:	Address:	Address:
Country:	Country:	Country:
Type of Product (ex. female shirts /pants):	Type of Product (ex. female shirts /pants):	Type of Product (ex. female shirts /pants):
Please list the process at this factory (ex. dyeing / printing / sewing):	Please list the process at this factory (ex. dyeing / printing / sewing):	Please list the process at this factory (ex. dyeing / printing / sewing):
Social audits conducted in the factory:	Social audits conducted in the factory:	Social audits conducted in the factory:
Please inform if any certifications (such as GOTS / GRS / RWS):	Please inform if any certifications (such as GOTS / GRS / RWS):	Please inform if any certifications (such as GOTS / GRS / RWS):
Please list which other brands are produced in the factory:	Please list which other brands are produced in the factory:	Please list which other brands are produced in the factory:

For more units, please provide information below:

APPENDIX B: HUMAN RIGHTS POLICY

INTRODUCTION

At MINIMUM A/S, we commit to respecting all human rights as defined in and recognized by internationally agreed human rights organizations.

When operating in countries where local regulations are less stringent than international human rights standards, we will follow international standards.

This policy applies to MINIMUM A/S and our business partners, retailers, vendors, and suppliers. While our business can help to promote human rights in certain areas, we recognize that we first and foremost have a responsibility to respect human rights of all individuals along our value chain.

Our commitment requires us to exercise due diligence to detect, prevent, and mitigate any adverse impacts related to human and labour rights and to provide remedies where we have contributed to adverse impacts. Integrating human rights due diligence into our business and way of working is an ongoing process, and we use this Policy to guide us and our decision-making.

Our approach to human rights begins with understanding how our activities and products, as well as the activities of our business partners may impact, either positively or negatively, our rightsholders. Through this exercise we have identified three priority areas representing our main human rights issues. We strive to ensure that the rights of rights holders within our priority areas are respected and promoted through our activities and those of our business partners. Wherever relevant and possible, we will engage in capacity building

activities, collaborations, and partnerships to further advance respect for human rights in our value chain.

01. Fair and Safe Work
02. Consumer Rights and Safe Products
03. Design and Marketing Practices

FAIR AND SAFE WORK

MINIMUM A/S commits to treating workers with dignity, respect, and fairness. They should not be subject to harassment, discrimination, forced labour, or inhumane treatment, but should enjoy fair and decent working conditions and be able to exercise their right to freedom of association and collective bargaining. We are working continuously to providing a safe, inclusive work environment for our employees and contractors in line with international labour standards and applicable local laws and regulations wherever we do business.

To promote these values across our supply chain, we are continuously implementing more robust oversight mechanisms and expectations for our business partners and suppliers to meet the same standards in their own operations. As part of this work, all our suppliers commit to the requirements in our Code of Conduct, which details our expectations on human rights, the environment and anti-corruption. Through dialogue, self-assessments, and third-party audits, we work to ensure loyalty to our requirements.

CONSUMER RIGHTS AND SAFE PRODUCTS

MINIMUM A/S commits to respecting the human rights of our consumers in the countries we operate and where our products are sold. First and foremost, this means never compromising the safety of our products and ensuring that the health and safety of consumers is protected. We have defined a list of chemical requirements to which all our suppliers commit, to ensure that no hazardous chemicals are found in our products, and we comply with all relevant laws and regulations in the countries where we operate.

DESIGN AND MARKETING PRACTICES

With our design and marketing of our products, MINIMUM A/S has a unique opportunity to promote non-discrimination, respectful representation, and diversity. We strive to ensure that our marketing is done respectfully, promoting diversity and

differences in backgrounds, styles, sizes, age, and ethnic background.

Focusing on our consumer engagement, we strive to respect the privacy rights of consumers by ensuring safe storing of any personal data.

GOVERNANCE

Human rights at MINIMUM A/S are part of our wider sustainability and responsibility strategy and are implemented through a number of policies and procedures. We monitor and evaluate our progress against our targets and goals.

Ultimate oversight of human rights at MINIMUM A/S falls with our MINIMUM A/S CEO. Operational oversight of human rights is managed by CSR RESPONSIBLE, in addition to our partners across our business units.

REMEDICATION

MINIMUM A/S is committed to providing effective resolution where we have caused or contributed to adverse human rights impacts. In line with the expectations articulated in the UN Guiding Principles on Business and Human Rights (UNGPs), we provide grievance mechanisms for employees to report concerns about human rights and receive remedy. We have a non-tolerance policy towards intimidation or retaliation against anyone who raises a concern.

Where human rights impacts are directly linked to our business relationships, we will use our influence to encourage our suppliers or business partners to prevent, mitigate and address adverse impacts on human rights.

We strive to routinely review and update our approach to addressing human rights and use due diligence and monitoring for continuous improvement. Our human rights policy will be reviewed on a regular basis to reflect these updates.

APPENDIX C: CHILD LABOUR POLICY

In accordance with our Code of Conduct, child labour is not allowed throughout our entire supply chain.

DEFINITION OF A CHILD

The definition of a child is a person under the age of 15. Unless country regulations stipulate a higher age, in which case the higher age shall apply.

DEFINITION OF A YOUNG WORKER

The definition of a young worker is any worker from 15 (or 16) year of age until 18 years of age.

THE REQUIREMENTS

Suppliers must ensure that child labour is not present in our supply chain.

- MINIMUM A/S does not accept any form of employment of children below the minimum age mentioned above.
- The factory must have proper hiring systems in place to prevent children from working at the factory. Records of age verification must be kept at all times.
- If the factory is providing childcare facilities, they must ensure that the children remain at that area and never enter into production areas.
- Young workers should only perform light work, which does not encompass working with dangerous chemicals, heavy lifting or dangerous machinery.
- Young workers should not be subjected to work that can be harmful to their health or physical,

mental, spiritual, moral or social development.

- MINIMUM A/S must be informed immediately if confirmed child labour is detected.
- If child labour is detected at the production units, the supplier is requested to make sure that proper measures in the best interest of the child are taken and below Child Labour Policy shall apply.

IN CASE OF CHILD LABOUR

In cooperation with the supplier a satisfactory solution, taking into consideration the child's age, social situation and education must be found. Any measures taken should always aim to improve, not worsen, each child's situation.

If children are to be replaced from improper working, then the factory should continue to pay the wages to the child until it reaches the legal age for working. If possible, a member of the child's family should be offered the position and paid a minimum wage. This is in order to secure a stable private economy of the child and its family.

If the child has finished primary school, the child should be offered education that supports the child's further development until it reaches the legal age for working, after which the child should be offered the job again on the same terms as other workers in the factory.

MINIMUM A/S reserves the right to involve non-governmental organizations with the purpose of driving the process to secure the child's future.

If supplier refuses to cooperate in implementing this policy after child labour has been confirmed, we will terminate all business with said supplier.

However, if the opposite, we will continue our cooperation with the supplier and help to ensure, that a child is not hired into the factory again.

APPENDIX D: ENVIRONMENTAL POLICY

PRECAUTIONARY APPROACH AND ENVIRONMENTAL MANAGEMENT.

It is of high concern to MINIMUM A/S that environmental impact is kept to a minimum throughout the value chain, and through our Code of Conduct and our environmental policy, MINIMUM A/S demonstrates our commitment to protecting the environment. We recognize that the largest environmental impacts of our business come from our product purchases, the use of our products and their subsequent disposal as waste and therefore we're taking on a precautionary approach to all operations applied in the making of our products.

We expect our suppliers to apply same precautionary approach and establish a systematic mode of operation that limits the risk of serious or significant impact to the environment (e.g. major damage to the local ecosystem, closure of a potable water abstraction point, known onsite or off-site impact to soil, air, groundwater or surface water).

- The supplier must always be able to provide applicable and valid environmental permits and licenses as well as documentation for their practices.
- The site on which the supplier operates, shall not be under threat of prosecution, fines and/or enforcement in relation to environmental issues.
- It is not acceptable to operate critical abatement equipment e.g. air emission scrubber, incineration unit etc. It is of high concern to MINIMUM A/S that environmental impact is kept to a minimum in the whole lifecycle, from raw material extraction, production, transportation, use phase and up until

it is discarded or recycled.

RESOURCE USE AND PRODUCT DEVELOPMENT

MINIMUM A/S is committed to making mindful design and material choices to use and reuse natural resources in a responsible way. This means:

- Using recyclable or recycled materials wherever possible and whenever legally permitted with respect to requirements regarding traceability and hygiene.
- Where feasible, designing products that can be separated into material fractions when they at some point, are to be disposed of as waste.
- We strive to give our suppliers the best conditions to operate and comply to our requirements of improved environmental impact. Such as timely manner of order placement to avoid airfreight

From our suppliers, we require that:

- The supplier shall strive for minimal use of natural resources such as water and raw materials.
- The suppliers shall take environmental impact into consideration in product development and sourcing, thus meeting the increased demand and need for more responsible material alternatives.

ENERGY, EMISSIONS, AND WASTE

- Renewable energy sources shall be prioritized, and the supplier shall measure and control the use of energy in its operations.
- The supplier shall minimize emissions to air, water, and ground. Emissions, including but not limited to CO2 shall be measured and reduced. This regards emissions generated from transport as well as production processes. The measurements shall be provided to MINIMUM A/S upon request.
- The supplier shall strive to reduce environmental impact from transportation by using road, sea or rail transport and avoiding air transport to the furthest extent possible. Fuel-efficient vehicles shall be used when transporting goods by road.
- Water shall be used with care. The use of

water should be reduced to a minimum and all wastewaters must be purified before discharge. Sludge must be treated to prevent pollution. Wastewater test results shall be provided to MINIMUM A/S upon request.

- Waste shall be handled by authorized waste contractors and shall kept to a minimum and be reused and recycled when possible.

APPENDIX E: ANTI-CORRUPTION POLICY

MINIMUM A/S is committed to adhere to the UN Convention Against Corruption.

WHAT IS CORRUPTION?

Corruption is defined as the abuse of entrusted power for private gain. Corruption is not always about money, it can also be for example preferential treatment, extra service to gain an advantage.

Employees of MINIMUM A/S and our partners must avoid the following situations of corruption:

CONFLICT OF INTEREST

- This occurs in situations where an employee has a private interest or personal gain from a certain situation or deal.

BRIBERY

- Bribery is the act of offering, giving (active bribery), receiving, or accepting (passive bribery) any item of value to influence the actions of an employee.

- MINIMUM A/S will not give or accept bribery in any form.

EXTORTION

- Extortion occurs when an employee unlawfully demands or receives money through intimidation. Extortion may include threats of harm to a person or his/her property, threats to accuse him/her of a crime/illegal act, or threats to reveal embarrassing information.
- Employees of MINIMUM A/S must not seek to influence any person by using their position or by using force or threats.

FRAUDULENT BEHAVIOUR

- Fraudulent behaviour involves deliberately being dishonest or misleading, engaging in deceitful behaviour or acting under false pretences.
- Employees at MINIMUM A/S must not exercise such behaviour under any circumstances.

RECEIVING GIFTS AND HOSPITABLE BEHAVIOUR

- Gifts and hospitality may be used to enable corruption or may give the appearance of corruption. Gifts may include cash or assets given as gifts.
- Hospitality may include meals, hotels, flights, entertainment or sporting events.
- As a general rule, employees should not receive gifts or other benefits in connection with their work. However, giving small gift and showing hospitality may be customary in some countries, and it would be impolite not to receive it. However, gifts, should be kept within a reasonable financial level, that reflects the nature of the business with that specific partner.
- Gestures which may be considered remuneration for a task performed, such as a couple of bottles of wine for doing a presentation, are not considered gifts.
- Employees at MINIMUM A/S must not give, request, or receive directly or indirectly

NEPOTISM

- Nepotism is incidents where family and friends are favoured and treated advantageously due to close personal relations, rather than on the basis of a professional assessment of their capabilities.
- Employees of MINIMUM A/S must not favour friends, family or other close relations in recruitment, procurement, or other situations.

All employees of MINIMUM A/S are obligated to notify their superior immediately about any proof or suspicion of breach of one or more anti-corruption principles. This applies regardless of whether the case involves other employees, business partners and partners in programmes or projects. They are also obligated to notify their superior about potential or current conflicts of interest.

Non-compliance of this policy will result in termination of contract, this includes contracts/orders with our suppliers and/or employment contracts with our employees.

FOR SUPPLIERS

MINIMUM A/S Code of Conduct includes our non-acceptance towards corruption in any form. Signing that, you also sign this policy.

FOR EMPLOYEES OF MINIMUM A/S

Employee of MINIMUM A/S have been made aware of this policy and new employees are made aware, upon hiring.

APPENDIX F: ETHICAL SOURCING REQUIRE- MENTS

For MINIMUM A/S, it is part of our company values, that we do business with a high sense of moral and ethics. It is important to us, that no people or animal are harmed during the production of our goods. Be it at the cottonfield, the stitching factory or our warehouse. Therefore, we ask the suppliers working for MINIMUM A/S to commit to the following Sourcing Requirements:

- **SANDBLASTING**

There is a great risk to human life involved in the process of sandblasting, we will not accept that our products be sandblasted under any circumstance. MINIMUM A/S commits to working with the supplier for alternative solutions. When you sign this document, you also accept not to use the process of sandblasting on any products delivered to MINIMUM A/S.

- **SOURCING COTTON FROM UZBEKISTAN AND TURKMENISTAN**

To limit the risks, that the cotton used in our products come from areas that do not respect Human Rights and the Right of the Child, we cannot allow the sourcing of cotton from these countries.

- **SOURCING FROM SPINNING MILLS WITH SUMANGALI SCHEME IN INDIA**

Suppliers will not source from spinning mills supporting “Sumangali schemes” and similar forms of bonded- or child labour.

- **REFUGEE WORKERS IN TURKEY**

Suppliers will ensure that Syrian refugee workers have a temporary working permit and/or assist them in applying for one. Suppliers will help to ensure that Syrian refugee workers are not exploited in our supply chain.

- **FORCED LABOUR OF UYGHUR MINORITY IN XINJIANG PROVINCE, CHINA**

Suppliers will ensure that when sourcing from factories in the Xinjiang Province, that Uyghur and other minority people are not working there as forced labour.

- **VISCOSE**

MINIMUM A/S does not accept viscose fibers sourced from endangered forests.

This document is updated regularly when/if we become aware of more supply chain issues that needs to be banned or where compliance should be ensured. When you sign this document, you also sign any updates we might have in the future. We will send the update to you, and if you have any disagreement or questions to the update, you are more than welcome to contact us.

This document is an addition to our Code of Conduct, not a replacement.

APPENDIX G: CHEMICAL POLICY

The REACH chemical restrictions describe limitation and prohibition of substances in products produced for European market. The listed values and additional notes are applicable to all suppliers manufacturing or providing products for MINIMUM A/S.

We request that you familiarize yourself with the regulation: [Substances restricted under REACH - ECHA \(europa.eu\)](http://europa.eu), and ensure that you are always fully updated on the requirements of REACH.

The REACH applies to and cover all garments, accessories, and other products of value. This includes every type of supplement such as zippers, buttons, rivets, and labels.

It is the responsibility of the supplier to ensure that the articles and goods, which are supplied, meet all requirements. The responsibility should also cover and must be fully communicated and controlled by all sub-contractors and suppliers of raw materials and other components.

Suppliers must be familiar and comply with all legislation, product requirements and manufacturing requirements, where they are producing, and these include all environmental laws as well.

FORBIDDEN OR LIMITED CHEMICALS

Please note, suppliers must never utilise chemicals listed on the candidate list for any garments, accessories, and other products of value to MINIMUM A/S.

- The “substances of very high concern” (SVHC) i.e. the [European Union REACH Regulation \(EC\) no. 1907/2006 Candidate List](http://europa.eu) and are requested to check the list on a regular basis as this list is currently being updated.

Please note that chemicals listed in in the REACH annex XVII are limited/restricted substances, and must be complied to any garments, accessories, and other products of value to MINIMUM A/S:

- The [European Union REACH Regulation \(EC\) No 1907/2006 Annex XVII](http://europa.eu) and later amendments.

In addition, it is expected that all suppliers must observe and comply with all legislation and product requirements from EU countries and other relevant countries of exports.

MINIMUM A/S's purchasing Department also requires having finished garments from bulk production tested in order to complete an audit. MINIMUM A/S will make the request in time to complete the test prior to hand-over of the order. MINIMUM A/S's nominated testing agency is: TÜV Rheinland.

COSTING

For all tests required by MINIMUM A/S's purchasing department, the costing shall be covered as follows:

- If all tests on the garment are stated with a “PASS” result, MINIMUM A/S will cover the cost of the test.
- If any test made on the garment is stated with a “FAIL”, the supplier is held responsible to cover the cost of the entire test.

Moreover, the supplier is held responsible to cover all expenses necessary to rectify the production in order to remove the chemical(s) present in the garment.

MINIMUM A/S reserves the right to demand reimbursement from the supplier should a failed test result in loss of turnover, either due to delay, inadequate commodities, legal requirements, or any other reason for loss of turnover. Additionally, the supplier must compensate for the potential air shipping of the goods.

ADDITIONAL REQUIREMENTS AND RESTRICTIONS

- Odour and strong smells from garments can occur through possible unauthorized chemical content, bad practice in washing or drying process prior to shipment. MINIMUM A/S expects garments to have a “product specific smell”, and “non-product” specific odour will be treated as a quality issue, even if the garment is meeting the RSL, and claims will be made to the supplier.
- Gassing, fumigating, or spraying cargo or containers with any chemicals is banned, and levels of chemicals may be measured at the port of destination. Regardless of the source, all costs in connection with cleaning containers, damage or loss of products, the claims will be made to the supplier.

TESTING AND CONTROL

- Suppliers must assume responsibility in ensuring that the production value chain are informed continuously about MINIMUM A/S requirements – and that all materials coming into the factory meets the standards.
- MINIMUM A/S will request chemical tests on products and further has a random check program in-house, to make sure that all products and components comply with our requirements and abide with the legislation.
- MINIMUM A/S recommend testing according to AFIRM guidelines Table 4. AFIRM RSL Testing Matrix on page 13-14, in order to secure testing of materials for relevant substances according to REACH: [AFIRM RSL 2021](#)

APPENDIX H: ANIMAL WELFARE POLICY

MINIMUM A/S does not allow animals to be harmed in the name of fashion.

Animals used for our products must not be exposed to pain but treated with dignity and respect according to animal welfare laws and international recommendations.

We require our suppliers to work with us to increase traceability in our supply chain in order to decrease the distance to animal farms.

- MINIMUM A/S does not support testing on animals.
- The killing of animals must always be using the quickest and the least painful method available.
- Transportation of animals must always be following local legislation and ensure that animals are not travelling long distance and are ensured enough space and access to food and water during the transportation.

The Five Animal Freedoms must be followed:

- **FREEDOM FROM HUNGER AND THIRST**
By access to fresh water and diet to maintain health and strength.
- **FREEDOM FROM DISCOMFORT**
By providing an appropriate environment including shelter and a comfortable resting area.
- **FREEDOM FROM PAIN, INJURY OR DISEASE**
By preventing them from getting ill or injured and

making sure the animals are treated if they do.

- **FREEDOM TO EXPRESS NORMAL BEHAVIOUR**
By providing sufficient space, proper facilities and company of the animal's own kind.
- **FREEDOM FROM FEAR AND DISTRESS**
By ensuring conditions and treatment which avoid mental suffering.

BANNED ANIMAL-DERIVED MATERIALS OR TREATMENTS OF ANIMALS

The following animal-derived products or practices are banned in MINIMUM A/S products:

- **ENDANGERED SPECIES**
MINIMUM A/S does not sell products that derives from animals appearing on either of these lists:
 - The International Union for the Conservation of Nature (IUCN)
 - The Convention of International Trade in Endangered Species (CITES).
- **FUR**
MINIMUM A/S does not use fur in any of our products. We will only ask for fake fur, when placing orders. To ensure this ban is kept, random tests are being initialized.
- **LEATHER**
MINIMUM A/S condemns the process of live skinning and live boiling, and we require our supplier to guarantee that this process is not practiced anywhere in our supply chain.
- **ANGORA WOOL**
Since we are unable to ensure that the rabbits are being ethically treated in our supply chain, the use of angora wool has been banned for MINIMUM A/S products.
- **DOWN**
MINIMUM A/S does not allow real down, but require that you use fake down in our products instead
- **WOOL**
MINIMUM A/S does not accept wool from new-born animals or aborted animals (e.g. Karakul)

- **MULESING**
MINIMUM A/S condemns the practice of mulesing, and we require our supplier to guarantee that this method is not practiced when sourcing merino wool. This practice is mostly done in Australia, so you must be cautious when sourcing from that area.

RESPONSIBLE TREATMENT

When sourcing below mentioned animal-derived materials, you must ensure that the animals are treated according to our animal welfare policy.

- **MOHAIR WOOL**
MINIMUM A/S does not allow the mistreatment of the Mohair goats during shearing of their wool. We are working on sourcing certified mohair wool and the support the development of such a certification.
- **WOOL**
Ensuring a good treatment of the animals when shearing of wool, is essential to MINIMUM A/S. To ensure this, we require our suppliers to work with us to increase traceability in our joint supply chain.
- **LEATHER**
We only accept the use of leather from animals that have been bred for the food industry. Animals should be treated according to our animal welfare policy and in order to ensure this, we require our suppliers to work with us to increase traceability in our joint supply chain.