

MR MARVIS

Code of Ethics



Introduction

To this Code of Ethics

MR MARVIS aims to make people feel marvellous. We share positive energy with people around the world by creating iconic designs, offering best-in-class service and driving conscious decisions for people and planet.

Our mission requires us to do things the right way. Only by being truly committed to ethics, can we bring our purpose to life, build great products and strengthen trust with the people around us.

That's why we are proud to share our new Code of Ethics. This Code outlines the standards to which we comply as a company. It will also serve as a guide that helps our employees to navigate complex situations and do what's right.

If we all bring our Code of Ethics into practice and use it to guide our individual work, we are certain we can achieve our objectives and improve the overall impact of MR MARVIS together.

Feel free to reach out if you have any questions!

The Management Team

Steven, David, Aafke, Carl, & Marinke



A guide for the MR MARVIS team

To whom this Code concerns

Our Code of Ethics applies to all of us. From new parties to founders, everyone at MR MARVIS is expected to know and follow the standards outlined in this document, and to remind others of them when appropriate. Be aware that failure to apply this Code can result in disciplinary action, and may even result in a termination of employment, irrespective of grades or roles.

Please note that leaders have a special responsibility for shaping our culture and upholding our standards. We expect our leaders to be role models and take responsibility for their teams to behave according to this Code. And when concerns are raised, we expect leaders to listen carefully, take every concern seriously, protect confidentiality, and take action.

Our commitments

In this Code of Ethics

On the following pages, we outline the commitments we value as a company. These commitments are divided into four key principles, all explained in more detail:

- **We always Show Respect**
- **We Focus on What Matters**
- **We Act like Owners**
- **We Uphold the Law**





We always show respect

We are committed to showing each other respect. This means that we treat our employees equally and with respect, regardless of origin, age, gender, belief or disability, and create a working environment that is welcoming to all. In return, we expect you to treat your colleagues and other people you work with the same way.

Speak up but listen

Our commitment: To remain a flat organisation, in which employees listen to each other and feel free to speak their mind.

In order to be successful as a business, we foster teamwork and employee participation. Hence, we encourage and expect you to speak up and participate while at work, by sharing your ideas, suggestions and opinions. In return, we expect you to listen to your colleagues and provide constructive feedback if desirable.

Diversity & inclusion

Our commitment: To create a diverse and inclusive working environment, in which all employees are treated with respect.

We highly appreciate the diverse and international character of our team and value the different perspectives our employees bring to the table. We will continue to educate our people on the topics of diversity and inclusion, and create a workplace that allows everyone to feel safe being their authentic self.

Equal opportunities

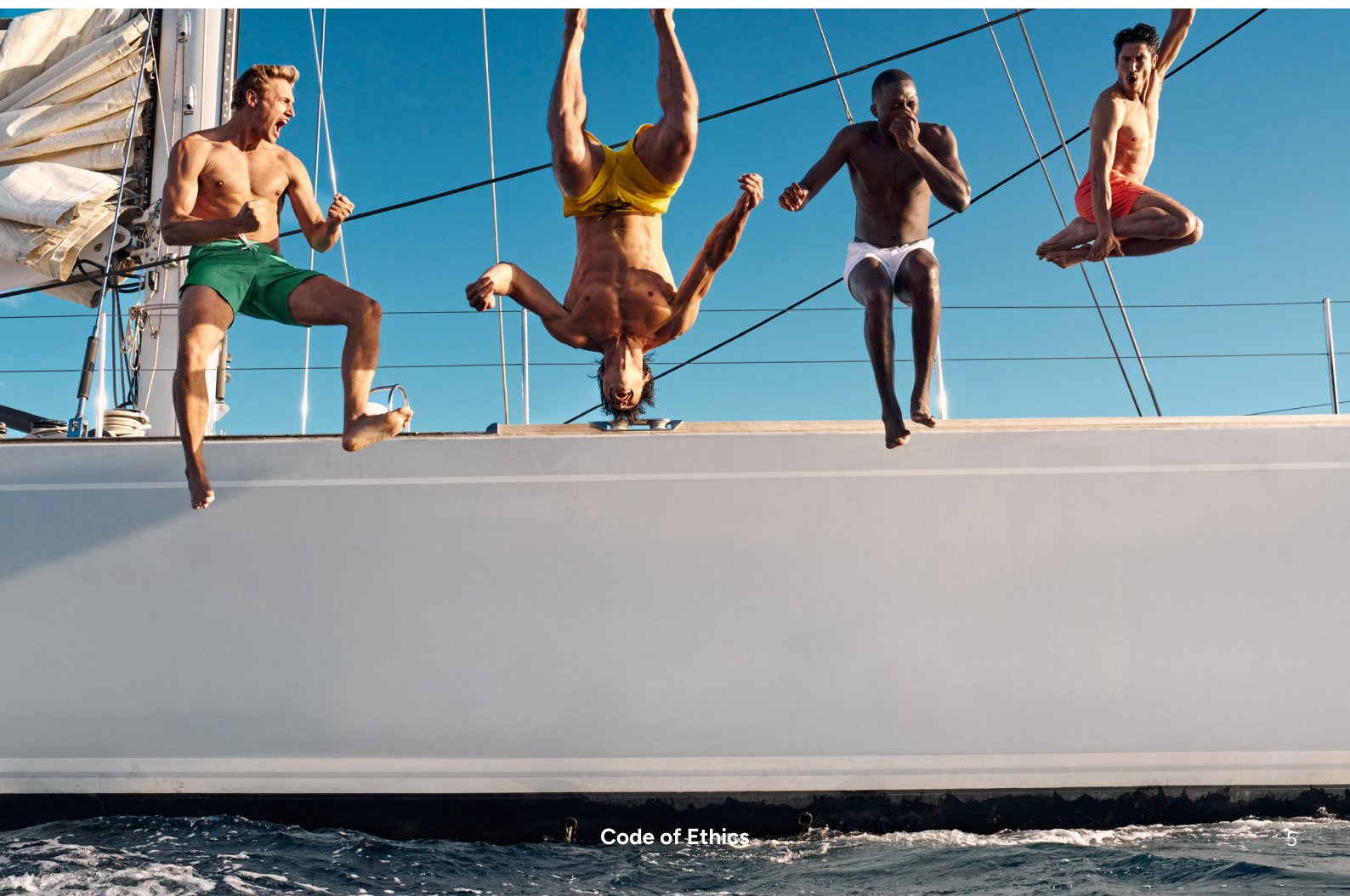
Our commitment: To avoid preferential treatment and help our employees reach their fullest potential.

By using measurable skills and achievements as the main criteria for assessing job applicants and current employees, we are committed to providing our employees with equal opportunities to contribute to the success of our business and advance their individual careers.

Conflicts of interest

Our commitment: To ensure that our business decisions are not influenced by personal interests.

When you are in a situation in which competing interests could cause you to pursue personal benefit for you, your friends, or your family at the expense of MR MARVIS, you may be faced with a conflict of interest. We expect you to avoid conflicts of interest or situations that can be perceived as such, for instance by delegating a task or decision to a colleague. If the conflict cannot be avoided, we expect you to inform your manager or our trust person.



We act like owners

At MR MARVIS, we value the entrepreneurial spirit. This means that, by keeping our shared goals in mind, we encourage you to show initiative and take responsibility. An important part of this is that you protect confidential information as well as company resources in the ways described below.

Handle resources with care

Our commitment: To ensure that our company resources are used with the right intentions.

We expect our team to always act in MR MARVIS' best interest and carefully manage all of our resources. This includes our financial resources, but also other assets, such as our property and the equipment provided by MR MARVIS. The occasional and reasonable use of equipment for private ends - such as laptops, phones and software - may be tolerated, under the supervision and with the approval of the management.

Take initiative & flag issues

Our commitment: To encourage our employees to be proactive.

We can only win if we work together. Having the courage to challenge each other, ask a colleague for help or flag issues or concerns is essential if we want to be successful as a company. Therefore we expect you to guard your own tasks and responsibilities, stay open for new tasks and responsibilities and let others know when you cannot meet a deadline or expectation.

Business confidentiality

Our commitment: To protect confidential company information, as well as nonpublic information entrusted to us by stakeholders.

We are a transparent company and communicate openly. After all, information helps us to work effectively together. However, if used inappropriately, information can cause damage to our business. Therefore, we expect you to protect business confidentiality by respecting signed agreements, limiting the disclosure of information to the people concerned and paying attention to verbal or visual information disclosed in public spaces.



We focus on what matters

As a clothing brand, we hold ourselves accountable for the impact we have on people and the planet. We aim to make responsible decisions in every part of our business, including the way we design our products and operate our shops and offices, so we have a positive impact on the people we depend on.

Environmental sustainability

Our commitment: To minimise the environmental footprint of our activities and products as much as possible.

Besides complying with environmental laws and regulations, we are committed to promoting greater environmental responsibility. We do so by monitoring and minimising our carbon footprint and working on closing the loop, by reducing our waste and increasing our use of recycled and regenerated alternatives.

Animal welfare

Our commitment: To continue to improve our animal welfare policy.

None of our products are tested on animals or contain feathers, fur or exotic skins. Where possible, we source our wool from farms that are committed to the highest levels of animal welfare and do not accept wool from farms that allow mulesing.

Health & safety

Our commitment: To protect and promote the health and safety of our employees, visitors and the communities we operate in.

To be successful as a company, maintaining a healthy and safe workplace for our employees, contractors and visitors is key. After all, if we take care of our own people, they can take care of our customers and each other. That is why we are committed to identifying and mitigating health and safety risks wherever possible and promoting best practices.

Eradicate modern slavery

Our commitment: To promote good labour standards and protect human rights in all parts of our business.

Protecting the rights and well-being of people in our supply chain has always been a priority. That is why we source our materials and products through a carefully selected network of suppliers, mainly based in Portugal. We are committed to building personal relationships with our suppliers and working together to ensure a healthy working environment for all people in our supply chain.



We uphold the law

An important part of this Code is our commitment to obey the law. Violations of the law can lead to fines, civil law claims, reputational damage, administrative or penal prosecution or other severe disadvantages for MR MARVIS or you personally. We do not tolerate violations and will take appropriate action if this happens.

This is not limited to the areas of law described below, but we expect you to be extra mindful of them, to **avoid unintentional breaches**:

Anti-corruption

Our commitment: To not tolerate any form of bribery or corruption.

At MR MARVIS, we want to conduct our business in an honest and ethical way. That is why we take a zero-tolerance approach to bribery and corruption. As such, we will not give or promise to give anything of value or accept or agree to receive anything of value for the purpose of improperly influencing any business decisions.

Fair competition

Our commitment: To engage in fair competition and compete on the merits of our products and brand.

We believe that free and fair competition leads to the best outcomes for customers, society and our business. That is why we fully support competition and will not engage in agreements or conduct that unlawfully prevent or restrict competition in markets in which we operate. We are proud to compete on the merits of our products and brand alone.

Customs and trade compliance

Our commitment: To comply with customs regulations, export controls, and trade sanctions laws.

Complying with customs regulations, export controls, and trade sanctions laws allows us to deliver our products to our customers on time. That is why we do not engage with people or companies placed by governments on sanctioned party lists and comply with regulations and laws that govern the distribution of our products in markets in which we operate.

Data use

Our commitment: To use personal information that we are entrusted with in a responsible way.

Customers trust us with their private and sensitive information. Living up to this trust by respecting and safeguarding our customers' privacy is essential to us. That is why we adhere to our data privacy principles and take great care to maintain the confidentiality of this information and use it only in the ways needed to complete our work.



Our whistleblower system

How issues can be reported

If you experience inappropriate behaviour, feel discriminated against or harassed, don't assume that others already know. If you have a question, wish to discuss a sensitive situation, or observe behaviour that is not in line with our Code, please speak up. In some cases, the best approach may be to directly approach the involved colleague(s).

In other cases, you can speak to your direct manager or raise the matter with staff representatives from the Human Resources Department.

If preferred, and without needing to justify such an action, you can also choose to report violations directly to:

Carl (carl@mrmarvis.com) or Janine (janine@mrmarvis.com).

All reports will be followed up promptly, and an investigation will be conducted. In conducting its investigations, MR MARVIS will strive to keep the identity of the whistleblower as confidential as possible.

Anyone responding to a whistleblower in a revengeful way will be subject to disciplinary penalties. This means that even if the facts are not proven, a whistleblower acting in good faith will not have any cause for concern, and will be protected if he or she is subject to intimidation.



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