

# CODE OF CONDUCT

## Introduction

Founded in 2010, dressGuard GmbH is a young and dynamic company in the textile industry. As an innovative manufacturer of CI workwear and shirts, the company stands for state-of-the-art technology in production, for social and economic responsibility and for maintaining Europe as a production location. dressGuard believes in values, economy and moral standards. Economy and ethics are inseparably linked for the textile company. We can only achieve sustainable added value if we protect moral/ethical values.

dressGuard is committed to fulfilling its corporate and social responsibilities in a way that reflects the highest level of integrity and honesty. Our relationship with contractual partners, third parties and the general public has been based on trust and goodwill since the very beginning. Only by continuing our pledge to these principles can we ensure the lasting trust, acceptance and goodwill of our contractual partners and customers. The corporate success of dressGuard is the result of the combined efforts of all employees carrying out their responsibilities in an ethical way. In doing so, every employee should always strive to:

- serve our contractual partners honestly and fairly and to advise them comprehensively about their rights and obligations;
- fulfil our contractual obligations and other assurances;
- avoid putting a public official in a compromising position or impairing a public official's judgement by means of gifts or remuneration;
- promote and sell our products in a responsible and lawful way;
- preserve the integrity and reputation of dressGuard by protecting confidential and proprietary information that an employee becomes aware of as part of their employment;
- understand the proper use of our electronic communication systems, including social media; and
- perform activities for dressGuard in compliance with all applicable principles, procedures, laws and regulatory requirements.

The Code of Conduct of dressGuard GmbH is based on the following generally recognised guidelines:

- Universal Declaration of Human Rights of the United Nations
- United Nations Global Compact
- ILO Declaration on Fundamental Principles and Rights at Work
- Rio Declaration on Environment and Development
- United Nations Convention Against Corruption

## Human rights

dressGuard is expressly committed to safeguarding human rights within its sphere of influence. We undertake not to be involved in any form of human rights abuses, whether directly or indirectly.

We also expect our business partners to treat all people fairly and with respect and to protect human rights within their field of activity.

## Freedom of association and collective bargaining

Employees have the right to found a labour organisation or trade union of their choice or to join one for the purposes of collective bargaining. An employee shall not be disadvantaged as a result of being a



member of a trade union. Similarly, workers or their respective organisations may negotiate and conclude company agreements or collective agreements at the appropriate level.

Our business partners must also respect the right of their employees to freedom of association and collective bargaining.

## **Fair working conditions**

dressGuard ensures that working conditions are fair for all employees. This includes compliance with the respective national regulations on working hours as well as the right to appropriate pay, which is at least based on the respective statutory minimum wages or applicable collective agreements.

Similarly, all contractually agreed salaries, benefits and nationally prescribed social security contributions are made or paid.

Furthermore, dressGuard supports the further qualification of its employees.

We also expect our business partners to provide their employees with fair working conditions and appropriate pay. In particular, they are also obliged to comply with the provisions of the German Act Regulating a General Minimum Wage (MiLoG) and the German Act on Mandatory Working Conditions for Workers Posted Across Borders and for Workers Regularly Employed in Germany (AentG) insofar as the provisions are geographically applicable.

## **Ban on all forms of forced labour, child labour and human trafficking**

dressGuard is committed to the prohibition of all forms of forced labour. This includes all types of work or services that are forced upon a person under the threat of punishment or that a person does not perform voluntarily.

dressGuard also requires that its business partners do not permit any form of forced labour at their company. dressGuard is committed to the prohibition of any form of child labour. When employing minors, dressGuard observes the minimum age for admission to employment in compliance with national regulations. dressGuard is committed to the prohibition of all forms of human trafficking. dressGuard requires that its business partners do not tolerate any kind of forced labour, child labour or human trafficking at their company.

## **Ban on discrimination**

dressGuard does not tolerate any form of discrimination. In doing so, we respect the privacy of our employees. We are committed to promoting equal opportunities and diversity and to ensuring that all employment decisions, such as hiring, promotion, education and training, are made exclusively on the basis of the abilities and qualifications of the person in question. Aspects such as race, skin colour, nationality, ancestry, gender, sexual identity, faith, belief, ideology, political affiliation, age, physical condition, appearance, personal relationships or trade union membership must not influence employment decisions.

dressGuard rejects any form of sexual harassment and bullying of employees and shall take legal action against this using all legal means.

Similarly, we expect our business partners to promote equal opportunities and diversity, not to tolerate discrimination in employment decisions or any form of sexual harassment and bullying and to prevent all of these.

## Occupational health and safety

dressGuard complies with the applicable national legislation on occupational health and safety. Providing our employees with a healthy and safe working environment is a top priority for us. We are committed to minimising the risks to which employees are exposed by taking appropriate measures to prevent adverse health issues and accidents. The working conditions of the employees are designed to meet their needs and are subject to a continuous improvement process. All applicable legal framework conditions for health protection, workplace ergonomics and occupational safety are observed.

Our business partners are also required to comply with the applicable national occupational health and safety legislation. Our business partners must actively take measures to prevent work-related accidents, illnesses and fatalities so that employees are guaranteed a healthy and safe working environment.

## Environmental protection

dressGuard is committed to protecting our environment. This is one of our corporate goals, and we take resource-saving manufacturing into account as a factor for all of our products. The following guiding principles on environmental protection apply:

- reduction of energy consumption and greenhouse gas emissions;
- keeping the air clean and, in doing so, increasing air quality;
- management of natural resources;
- waste avoidance;
- preservation of water quality and the economical use of water; and
- responsible chemicals management.

We ensure compliance with applicable national environmental laws, regulations and standards. Furthermore, we support the use of modern, efficient and environmentally friendly technologies.

We also expect our business partners to protect the environment and to comply with the applicable national environmental laws, regulations and standards. Business partners must ensure that their activities do not cause any avoidable environmental damage.

Furthermore, our business partners should only use chemicals for textile treatment that at least meet the requirements of the ZDHC-MRSL in its latest version.

## Sustainability

dressGuard is committed to sustainable growth while at the same time controlling the impact of its business. We use natural resources efficiently and minimise waste. We believe that making our business grow should go hand in hand with optimising our environmental impact. Our willingness to adapt to climate change will ensure the sustainability of our business. We are consistently cutting our energy consumption, reducing our CO<sub>2</sub> emission intensity and investing in new technologies and offset programmes.

Our sustainability report, which was published for the first time in 2020, describes our understanding of sustainability in detail and shows which targets we have set ourselves and the measures we want to take to achieve this. The report is based on the criteria of the Baden-Württemberg Economic Initiative for Sustainability (WIN).

[https://www.nachhaltigkeitsstrategie.de/fileadmin/Downloads/Publikationen/Wirtschaft/WIN-Unternehmen/Berichte/2020/dressGuard\\_WIN-Charta\\_Nachhaltigkeitsbericht-2020.pdf](https://www.nachhaltigkeitsstrategie.de/fileadmin/Downloads/Publikationen/Wirtschaft/WIN-Unternehmen/Berichte/2020/dressGuard_WIN-Charta_Nachhaltigkeitsbericht-2020.pdf)

Therefore, we expect our business partners to achieve sustainable growth while at the same time controlling the impact of their business by improving their environmental performance. We also encourage and require these kind of improvements along the wider supply chain.

## Conflicts of interest

dressGuard avoids conflicts of interest wherever possible. We also actively seek to rectify identified conflicts of interest. This applies to internal conflicts of interest as well as to conflicts of interest with customers, suppliers and competitors. We expect our employees to devote all their energy to dressGuard and to take up secondary employment only to the extent permitted by law or as stipulated in their employment contracts.

## Bribery and corruption

Compliance with anti-bribery and corruption laws around the world is not only a legal requirement, it reflects our determination to act with the highest level of integrity and honesty. dressGuard rejects all forms of corruption, including bribery and blackmail. Decision-making processes must not be influenced in any way by improper benefits (cash, benefits in kind, leisure trips, etc.).

Conflicts of interest must be avoided. Existing personal interests or conflicts of interest must be disclosed. Disclosure shall not result in any disadvantages for the person concerned.

We also expect our business partners to take action against all forms of corruption and not to engage in unfair competition. Our business partners may not bribe or blackmail others nor accept bribes themselves. Furthermore, business partners must not make any price agreements with competitors or similar agreements.

## Competition law (conduct towards competitors)

Competition laws are there to promote a fair and open market by linking certain agreements and sharing information with competitors. Examples of prohibited agreements include price fixing or bid rigging, sharing territory or customers, boycotting customers or suppliers, and tying arrangements. dressGuard is committed to complying with applicable competition laws and does not approve of any activity that could constitute or appear to constitute an anti-competitive agreement. Violation of competition laws is a serious offence that may result in disciplinary action, including termination, as well as criminal prosecution and the risk of sanctions according to civil law. All employees are responsible for complying with the applicable competition laws.

It is unlawful to make agreements with competitors that may influence competition. The same applies to the exchange of information on prices and conditions,



capacities, market shares, margins, costs and tender content or conduct.

dressGuard expects that your business partners are also committed to the applicable competition laws and other laws regulating competition.

## **Intellectual property and plagiarism**

dressGuard protects the intellectual property of customers and employees via appropriate technical and organisational measures.

Internal regulations prevent counterfeit items from being put into circulation. These regulations must also be guaranteed by business partners.

## **Customs and foreign trade**

All goods liable to customs duty are properly cleared by dressGuard. dressGuard consistently complies with the legal requirements for export control and customs in the areas of foreign trade and customs law and ensures their proper implementation.

dressGuard expects its business partners to provide qualified and on schedule export control and foreign trade data and to implement sufficient supply chain security standards within global customs security programmes.

## **Financial responsibility and disclosure of information**

dressGuard observes the highest standards of honesty. It is vital that the internal and external reports and documents we prepare, publish or provide to the authorities are complete, fair, appropriate, on schedule, up-to-date and comprehensible accounts. Furthermore, accurate records and reports regarding financial information are necessary to make responsible business decisions.

All financial books, records and accounts must accurately reflect transactions and events and comply with generally accepted accounting principles and the internal control system of dressGuard. If employees are unsure about this they should contact our management team. Part of our commitment to honesty is guaranteeing that all of dressGuard's financial transactions are legally sound and for the purpose stated as authorised by dressGuard.

Every employee has a responsibility to be vigilant and to prevent transactions that could potentially expose dressGuard to suspected money laundering. Compliance with laws countering money laundering, the financing of terrorism or criminal activity in all jurisdictions in which we operate is also an expression of our commitment to professionalism, fairness and integrity. dressGuard also has an obligation to identify and report any such suspicious transactions or activities. Therefore, every employee is encouraged to report any justified suspicion, or even positive awareness, of money laundering or a financial crime to the management.

## Data privacy and information security

Personal data are only collected, processed or used by us if this is necessary for defined, clear and legitimate business purposes. The processing and use of data must be transparent for the data subjects and their rights of access and, if applicable, to object or correction, blocking and erasure must be safeguarded.

The protection of personal data, in particular those of employees and business partners is particularly important to dressGuard. We only collect or process personal data if this is absolutely necessary for the performance of the respective work task or it is required by law. No personal data may be collected or processed without the consent of the data subject or a legal basis.

## Scope of application

This Code of Conduct is the basis for all business relations with respect to all production processes and sites for retail and non-retail goods obtained from dressGuard. dressGuard reserves the right to review compliance with the standards stipulated herein in an appropriate manner, for example, as part of an audit, and to adjust them if necessary. Contractual agreements or other ancillary agreements may not circumvent the Code of Conduct.

In the event that laws or the standards set out here are violated, we shall act consistently, which includes taking legal action according to labour law or terminating business relations.

## Complaints procedure and whistleblower policy

This Code of Conduct is freely accessible to all employees of our business partners (in the appropriate national language where relevant). Anyone who becomes aware of violations of these standards or an active breach of the laws stated and recognised herein, is encouraged to contact dressGuard directly and inform us of the possible violations.

Information and complaints regarding possible violations of laws or the Code of Conduct can be reported via email to [dressguard@dressguard.de](mailto:dressguard@dressguard.de), by telephone at +49 7256 9246819, in person by appointment at the office of the representative at dressGuard GmbH, Wallgärtenstrasse 2a, 76661 Philippsburg or by post marked "personal/confidential" to: Ms Chiara Kulevski, dressGuard GmbH, Wallgärtenstrasse 2a, 76661 Philippsburg.

The anonymity of the whistleblower and confidentiality are guaranteed under all circumstances. The whistleblower is protected from retaliatory measures or reprisals.

The information provided shall not be disclosed to any other person without the prior written consent of the person making the report. Moreover, all reports made according to this policy shall be reviewed and investigated, even if made anonymously. If an employee makes a report that is not substantiated by the subsequent investigation, dressGuard will not take disciplinary or other action against them if that person has not acted unlawfully or improperly in any way with regard to the report. However, the employee is urged to be reasonably diligent when making the report. Deliberately inaccurate reports are not protected.



## Contact

If you have any questions on the topic of sustainability and the Code of Conduct, you can contact the listed contact person at any time.

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