BESTSECRET

# Supplier Code of Conduct

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#### 1. INTRODUCTION

BestSecret is committed to an environmentally and socially responsible corporate management. Respectful cooperation in a partnership as well as conscious perception of social responsibility form the basis for long-term corporate success. Among our business partners, we expect that the principles of ecological, social, and ethical behavior are observed and integrated into their corporate culture. Furthermore, we expect that they continuously optimize their business activities in terms of sustainability. Our Supplier Code of Conduct manifests these values in the form of ethical ideals and principles that are binding for all our suppliers worldwide. Our business partners must comply with all legal requirements relevant to the conduct of their businesses and must adopt and follow practices which safeguard human rights, workers' employment rights, safety, and the environment.

Our Supplier Code of Conduct is based on national laws and regulations as well as international conventions including but not limited to the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Practices, the United Nations Guiding Principles on Busi- ness and Human Rights, the International Labor Standards of the International Labor Organization, as well as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

# To whom does our Supplier Code of Conduct apply?

Our Supplier Code of Conduct applies to all business partners - including suppliers, service providers, dealers, consultants, and agents of the BestSecret Group. Furthermore, we encourage our business partners to take additional actions to improve the conditions in their own value chains.



#### FOLLOWING ILO INTERNATIONAL LABOR ORGANIZATION

The International Labor Organization (ILO) defines human/labor standards and rights that aim to achieve decent and humane working conditions, as well as to encourage social equity. These are based on international standard labor practices. The ILO conventions set the practical guidelines for public authorities, employers, employees, enterprises, and bodies. The stated Social Standards for suppliers focus on specific economic sectors and address particular issues, hazards and health/safety measures, which we request our suppliers to comply with:

### 2.1. Employment is freely chosen

We do not accept any form of forced labor or work enforced by deception, intimidation, or coercion. All workers must be allowed to satisfy their basic human needs (such as going to the toilet or drinking a glass of water) during working hours. Workers must be able to terminate their employment at any time in accordance with the applicable law. We also expect migrant workers to be employed only based on a valid work permit. Access to their own identity and residence documents must not be unlawfully denied to workers (ILO conventions 29 and 105).

# 2.2. No discrimination in employment

Recruitment, wage policy, admittance to training programs, employee promotion policy, policies of employment termination, retirement and any other aspect of the employment relationship shall be based on the principle of equal opportunities, regardless of race, color, sex, religion, political affilation, union membership, nationality, social origin, deficiencies, or handicaps (ILO conventions 100 and 111).

#### 2.3. No harassment or abuse

Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse (ILO convention 190).

### 2.4. No exploitation of child labor

Any kind of child labor is strictly prohibited. The age for admission to employment shall not be less than the age of completion of compulsory schooling and, in any case, not less than 15 years (ILO convention 138). There shall be no forms of slavery or prac-

tices similar to slavery, such as the sale or trafficking of children. Children (at the age of 15 – 18) shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety, or morals (ILO convention 182).

# 2.5. Freedom of association and the right to collective bargaining

The right of all workers to form and join trade unions and bargain collectively shall be recognized (ILO convention 87 and 98). The company shall, in those situations in which the right to freedom of association and collective bargaining are restricted under law, facilitate parallel means of independent and free association and bargaining for all workers. Worker's representatives shall not be subject of discrimination and shall have access to all workplaces necessary to carry out their representation functions (ILO conventions 135 and 143).

# 2.6. Payment of a minimum wage

Wages and payments for a standard working week shall meet at least legal or industry minimum standards and always be sufficient to meet basic needs of workers and their families and to provide some discretionary income (ILO conventions 26 and 131). Employees shall be adequately and clearly in-

formed about the specifications of their wages including wage rates and pay period.

### 2.7. No excessive working hours

Hours of work shall comply with applicable laws and industry standards. In any case, workers shall not on a regular basis be required to work more than 48 hours per week and shall be provided with at least one day off for every seven-day period. Overtime shall be voluntary and shall always be compensated at a premium rate. Moreover, public, or religious holidays should be respected. (ILO convention 1).

#### 2.8. Safe and healthy working conditionshours

A safe and hygienic working environment shall be provided, and best occupational health and safety practice shall be promoted, bearing in mind the prevailing knowledge of the industry and any specific hazards. Effective regulations shall be implemented to prevent accidents and minimize health risks as much as possible (ILO convention 155).

### 2.9. Fair Traded Precious Metals and Stones

The recent years, there has been more public awareness of bad working conditions and basic human rights abuse during the

mining of gold and diamonds and other precious metals and stones. Our suppliers must take appropriate measures to ensure that the minerals and metals used in their production and products do not directly or indirectly contribute to conflicts in countries that are highly affected by the operations of the mining industry. The supplier has to ensure and shall upon Best Secret's request demonstrate that measures have been taken to prefer fair mining metals and stones. The business partner shall furthermore avoid the use of conflict minerals in the meaning of the EU Conflict Minerals Regulation ((EU) 2017/821) such as:

- Columbite-tantalite (coltan)
- Cassiterite
- Gold
- Wolframite
- or their derivatives, mined in the Democratic Republic of the Congo or an adjoining country.



## 3.1. Environmental and climate protection

Ecosystems provide us with natural resources, such as clean air and water, which are essential to people, communities, and business. To meet the needs of present and future generations, the long-term health of ecosystems must be protected by preventing harm to the environment and by using natural resources responsibly. BestSecret believes that a safe and healthy environment is the obligation of every citizen and every enterprise. Suppliers shall fulfil their environmental responsibilities by complying with applicable legal requirements and recognized standards for the protection of the environment and climate and by making efforts to continuously improve the impact of business activities on the environment and climate.

- The supplier conducts all operations in full compliance with all applicable laws and regulations on air quality, air emissions and energy efficienc, including maintaining valid permits.
- The supplier conducts all operations in full compliance with all applicable laws and regulations on water conservation and water quality, including maintaining valid permits.

- The supplier conducts all operations in full compliance with all applicable laws and regulations regarding chemical use and disposal, including maintaining valid permits.
- The supplier conducts all operations in full compliance with all applicable laws and regulations including maintaining valid permits regarding waste. Where services are available, all hazardous waste must be handled by and authorized company or licensed receiver.

# 3.2. Endangered species (CITES)

Suppliers shall follow the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). CITES aims to ensure that international trade in specimens of wild animals and plants does not threaten their survival. It accords varying degrees of protection to more than 30 000 species of animals and plants. Suppliers are requested to consult under: https://cites.org/eng/disc/species.php find out whether their products are covered by CITES or not. On the EU Export Helpdesk, suppliers will find detailed information on CITES legislation and links indicating whether CITES is relevant to them. Specimens of species listed in appendices A and B of the EU Endangered Species Regulation are subject to an EU-wide uniform marketing ban: (Art. 8 Regulation (EC) 338/97).

3.3. Textile requirement

In its products BestSecret will accept only:

- leather or leather parts that originate solely from animals which have been used for meat production
- wool or wool parts that originate solely from sheep which have not been subject to mulesing
- down and feather that has been plucked from birds that are already dead, bred and slaughtered

BestSecret Minimum Requirements		
Down	<ul><li>No live plucking</li><li>No force-feeding</li></ul>	
Wool	Originates from sheep not subject to mulesing	
Leather/Fur	• Leather and fur originate solely from animals used for meat production	

For down, wool, cashmere, and leather, BestSecret's suppliers must provide the certificates specified below:

Standard		
Responsible down standard (RDS)		
Responsible wool standard (RWS)		
Leather working Group (LWG)		
Sustainable Cashmere Standard (from SFA) or The Good Cashmere Standard (from AbTF)		

All mentioned ethical principles also apply to mohair wool sourced from Angora sheep (currently no standard available but forthcoming).



## 4.1. Corruption, trade control, money laundering

accordance with the relevant legal provisions on the protection of trade secrets.

We expect from our suppliers that they reject any form of bribery and corruption and act in accordance with the applicable import and export control regulations, as well as comply with the legal requirements for the prevention of money laundering.

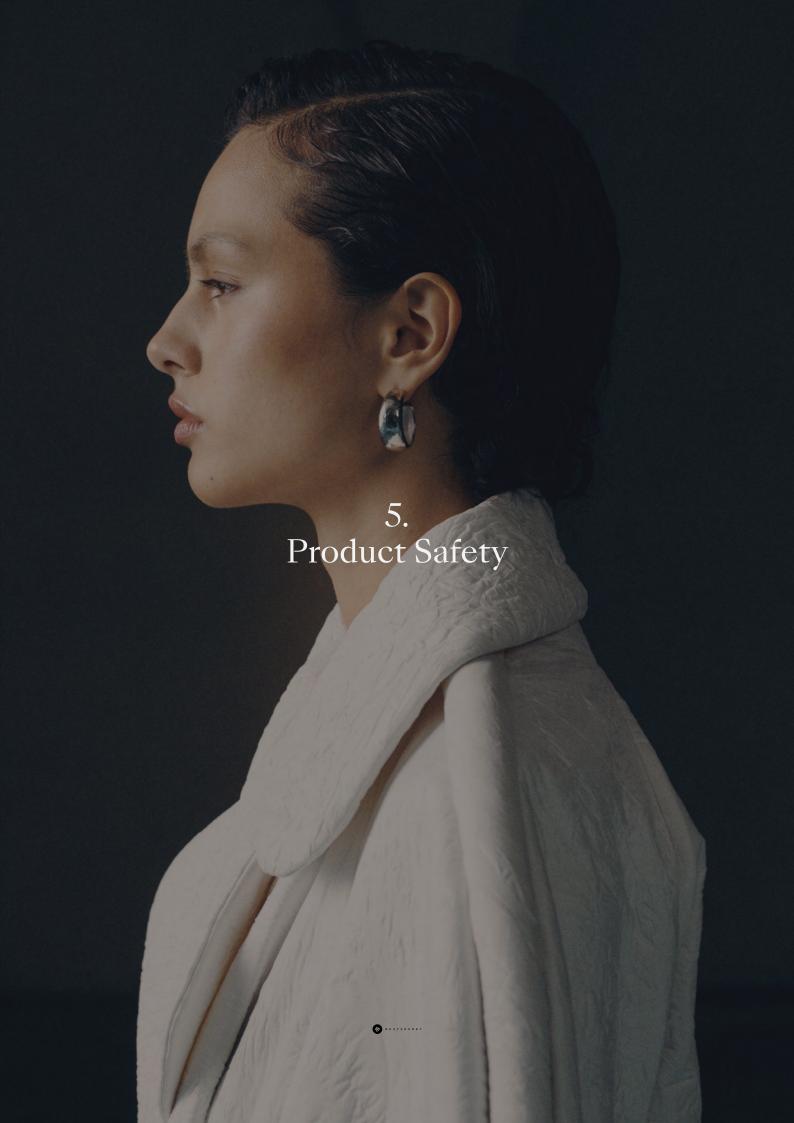
#### 4.2. Fair Competition

We expect our suppliers to advocate free and fair competition, not to tolerate anti-competitive agreements and to ensure that they act in accordance with applicable antitrust laws. Furthermore, they reject competitive advantages through unfair business practices.

# 4.3. Personal data, protection of confidential information and intellectual property

Our suppliers must respect the privacy rights of their employees and suppliers and comply with applicable legal and regulatory requirements regarding the processing of personal data and security of information when handling personal information.

We expect our suppliers to carefully protect the trade secrets and other confidential information entrusted to us from unauthorized acquisition, use and disclosure - at least in



We expect our suppliers to have taken appropriate measures to ensure the safety and quality of the products offered. In doing so, our suppliers must ensure that the products comply with the relevant statutory consumer protection provisions. For this purpose, our suppliers have access to our product safety manuals, which must be taken into account and complied with in any case.





We at BestSecret are dedicated to continuously improving our performance regarding labor, workplace conditions and environmental issues in our supply chain. We aim to engage in business only with companies that meet our standards for ethical operations and comply with the applicable laws and regulations for labor, workplace conditions and environmental compliance, as defined in our Supplier Code of Conduct. We reserve the right to conduct our own business partner due diligence and audits to help sourcing partners comply with industry standards, regulations, and our expectations with regards to health and safety, as well as our environmental and social responsibility. We as BestSecret employ audit results to drive continuous improvement and to derive strategic vendor development plans.

You will find our policy statement on human rights related risks and environmental expectations for our own employees and suppliers <u>here</u>.

