

Business Partner Code of Conduct

MF BRANDS
GROUP

AIGLE 1853

**THE
KOOPLER**


LACOSTE

GANT

 **Technifibre**

INTRODUCTION

The MF Brands Group through its 5 inspiring brands: Aigle, Gant, Lacoste, Tecnifibre and The Kooples has become after over 100 years of activity a major player in its field. Throughout this time, we have kept two special characteristics: we have remained an independent family business, managed for four generations by the Maus family's vision, and we have continued to perpetuate the values of quality, excellence and social conscience held by our founders.

These values guide each of our brands' actions and commitments in their business relationship, where they have strict requirements in terms of respect for human rights and environmental protection.

We are committed to establishing business relationships with partners whose policies regarding ethical, social, and environmental issues are consistent with our own, and the purpose of this document is to make the business partner aware of our commitments and expectations.

This Business Partner Code of Conduct, hereinafter referred to as the "Code", is based on internationally agreed upon standards, primarily the ten principles of United Nations Global Compact, covering human rights, labor rights, environmental care and anti-corruption.

This Code is mandatory for all business partners having a business relation with GANT by supplying goods and/or services, acting on behalf of or having collaborations with GANT such as e.g. suppliers, subcontractors, service providers and other organizations, hereafter referred to as "Business Partners".

The principles set out in this Code are minimum requirements. Business Partners must always comply with applicable international and national laws, regulations, and conventions. In the case of a conflict between national and international regulations, the regulation offering the most stringent protection shall be applied. Those regulations also will apply if they are more stringent than this Code and/or policies.

As a Business Partner to GANT, you should read and comprehend the content in this Business Partner Code of Conduct and comply with it in all business with GANT. The Business Partner also takes the responsibility of informing all its employees concerned about the content in the Code and making sure they comply with the Code accordingly. In addition, the Business Partner also takes the responsibility to inform all related subsidiaries and subcontractors about the Code to secure their awareness and possibility to comply.

GANT is committed to working with partners who agree to abide by the requirements set out in this Code and the principles put forward by:

The basic principles of human rights, as laid down in the International Bill of Human Rights (UNDHR, Civil and Social Covenant)

The UN Guiding Principles on Business and Human Rights (UNGPR)

The main Conventions of the International Labour Organization (ILO); especially convention 1921 (No.1), 1921 (No. 14), 1930 (No. 29), 1948 (No. 87), 1949 (No.95), 1949 (No. 98), 1957 (No. 105), 1970 (No. 131), 1973 (No. 138), 1999 (No. 182), 1951 (No. 100), 1958 (No. 111), 1981 (NO. 155), 2017 (no.205)

The OECD Guidelines for Multinational Enterprises

The OECD Due Diligence Framework for the Footwear and Garment Sector

The Dhaka Principles of Migration with Dignity

The basic principles of environmental protection

Conscious that compliance with this Code can only be possible through a collaborative relationship with its Business Partners, GANT commits not to impose conditions on its Business Partners which would prevent them from implementing the present Code.

Please sign the compliance commitment on the last page of this Business Partner Code of Conduct and return it to GANT, indicating that you have received, read, understood, and agreed to comply with the Code.

1. HUMAN AND LABOR RIGHTS

1.1. Freedom of association and right to collective bargaining

All personnel must have the right to exercise their legal right to form or join a trade union and participate in collective bargaining without threat of reprisal, intimidation, or harassment (ILO conventions 87, 98 and 135).

When operating in countries where trade union activity is unlawful or where free and democratic trade union activity is not allowed, Business Partners shall respect this principle by allowing employees to freely elect their own representatives with whom the company management and personnel can enter into dialogue about workplace issues.

1.2. No Discrimination

No discrimination shall be tolerated in hiring, remuneration, access to training, promotion, termination or retirement based on gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in workers' organizations including unions, political affiliation or opinions, sexual orientation, family responsibilities, marital status, or any other condition that could give rise to discrimination. (ILO Conventions 100, 111).

Business Partners should treat all personnel with respect and dignity and commit to a workplace free of harassment and abuse. Physical punishment or the threat thereof, sexual or racial harassment, verbal abuse or power abuse of any form of harassment or intimidation is unacceptable under any circumstances.

1.3. Prevention of forced labour and Human trafficking

Business Partners shall ensure that all work is voluntary. Business Partners shall not traffic persons or use any form of slave, forced, bonded, indentured or prison labour. Involuntary labour includes the transportation, harbouring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Business Partners shall ensure that the third-party recruitment agencies it uses are compliant with the provisions of this Code and the law.

The right of employees to terminate their employment after legal notice shall be respected.

1.4. Child labour and Young workers

GANT does not accept child labour.

Compliance with the national minimum age law for the admission to employment, and specifically, no hiring of children under the age for completing compulsory schooling and less than 15 years is allowed, or as an exception, 14 years of age in countries referred to in article 2.4 of the ILO convention 138. If the national legal age for working is higher than 15 years of age, the Business Partners must adhere to the higher requirement. The Business Partners shall establish and implement a child labour policy ensuring that no child is employed.

Young employees (below the age of 18 years) may only be employed in non-hazardous work and not work at night, if they are above the country's legal age for working. Business Partners shall not require juvenile employees to work overtime.

1.5. Fair Remuneration/ Wages and Benefits

Business Partners shall respect the right of the employees/workers to receive fair remuneration that is sufficient to provide them with a decent living for themselves and their family, as well as the social benefits legally granted, without prejudice to the specific expectations set out hereunder.

Business Partners shall comply, as a minimum, with wages mandated by government's minimum wage legislation, or industry standards approved based on collective bargaining, whichever is highest.

Wages, overtime at premium rate and benefits are to be paid in a timely manner, regularly, and fully in legal tender. Deductions will be permitted only under the conditions and to the extent prescribed by law or fixed by collective agreement.

All employees should be entitled to a written labour contract in accordance with the law.

Annual paid leave and local and national official holidays shall be provided as per local legislation.

1.6 Working hours and overtime

Business Partners shall set working hours in compliance with applicable laws, and regular working.

A workweek shall be restricted to 60 hours - including overtime - with regular work hours not exceeding 48 hours. Overtime must always be voluntary. Workers shall take at least one day off after six consecutive workdays except in emergencies or unusual situations defined by the ILO.

1.7 Working conditions and Health & Safety

Business Partners should comply with applicable laws and regulations for occupational health and safety and provide the employees with a safe and healthy workplace.

Employees should be provided with sufficient personal protection equipment for the work performed.

The Business Partners shall take efficient steps to prevent potential accidents and injuries to employees and have a clear set of regulations and procedures to be followed.

Business Partners shall provide access to potable water and clean toilet facilities, safe and clean eating and resting areas and if appropriate, sanitary facilities for food storage shall be provided. When dormitory facilities are provided, these should meet all applicable laws and regulations related to health and safety, including fire safety and electrical and structural safety.

Business Partners shall provide employees with appropriate workplace health and safety training in a language they understand. Health and safety related information shall be clearly posted in the workplace.

All personnel shall have the right to withdraw from imminent serious danger without seeking permission from the company.

2. ENVIRONMENT

Business Partners should comply with existing environmental legislations and obtain all legally required permits, licenses and registrations applicable for their business.

All employees, partners and Business Partners should show respect for the environment in their decisions and strive to minimize any negative impact on the environment.

The Business Partner shall introduce and maintain a suitable environmental management system or equivalent to minimize environmental risks, and continuously improve the company's environmental performance.

Procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, wastewater, emissions and effluent treatment must meet or exceed minimum legal requirements.

3. ETHICAL BUSINESS BEHAVIOUR

GANT expects the highest standards of ethical conduct in all of its businesses. Business Partners shall always be ethical in every aspect of its business, including relationships, practices, sourcing and operations, and comply with all laws applying to their activity in relation to GANT.

GANT has a zero tolerance for corruption and expects its Business Partners to undertake all necessary measures to condemn and fight against corruption, influence peddling, favoritism, illegal conflicts of interest and similar unethical behaviors.

Corruption is the act of any person to take any action, direct or indirect, monetary, or otherwise, aimed at influencing in any way an individual or an organization in the exercise of its functions in order to obtain an unfair advantage. It is possible to distinguish two types of corruption.

- a) Active corruption, which is the act of any person obtaining or attempting to obtain, by means of gifts, promises or advantages of any kind, the performance of, the delay in, or the refraining from the performance of any act related to his/her function or any act facilitated by it.
- b) Passive corruption which involves any person soliciting or accepting donations, promises or benefits of any kind.

Any payment made by or on behalf of the Business Partner must reflect a legitimate service and price as described in the relevant contract.

GANT does not allow its employees or other representatives to request, accept, arrange, offer or give any kind of personal advantage in connection with GANT's business.

GANT prohibits the payment of money to political or cultural parties, trade unions and organizations in order to promote a particular interest or to obtain or maintain a benefit.

The production of counterfeits is illegal and hinders the economic and social well-being of employees and customers. The Business Partners refrain from knowingly having their employees participate in the development, production, marketing or proliferation of counterfeits. The Business Partners shall systematically alert GANT when it has knowledge of counterfeits of GANT's brand or products in the framework of its dealings with or on behalf of GANT.

4. MANAGEMENT SYSTEMS

The Business Partner shall define and implement a policy for social and environmental accountability, a management system to ensure that the requirements of this Code can be met as well as establish and follow an anti-bribery / anticorruption policy in all their business activities. Management is responsible for the correct implementation and continuous improvement by taking corrective measures and periodical review of the Code, as well as the communication of the requirements of the Code to all employees. It shall also address employees' concerns of non-compliance with this Code.

4.1. Monitoring, Corrective Action and Non-Compliance

GANT expects its Business Partners to respect the Code and to actively do the utmost to fulfill GANT's requirements in their own organization and throughout their supply chain. This should be done by cooperating in a transparent manner, by sharing impacts data if required or for example granting GANT access to relevant documentation and premises.

GANT reserves the right to carry out announced and unannounced audits of all premises producing its goods or services or at any time, either by GANT or by an independent third party of GANT's choice. If an audit reveals less than full compliance with this Code, the Business Partner must take the prescribed corrective actions without delay.

If GANT determines that a Business Partner is violating this Code, GANT expects the Business Partner to take responsibility for the implementation of corrective actions. If corrective action is advised but not taken, GANT may suspend the placement of future orders or terminate the business relation at its own discretion.

4.2. Consequences of Non-Compliance

If a Business Partner fails to meet the requirements of this Code, and if no solutions can be agreed upon and implemented within a reasonable amount of time, GANT may choose to halt current commercial relation, cancel corresponding contracts, suspend future contracts and/or terminate the business relationship with the nonconforming Business Partner.

Place and Date: _____

Business Partner company Name: _____

Title: _____

Name: _____

Signature: _____