

1. COMMITMENT STATEMENT

Corruption and bribery are major global challenges posing serious obstacles to sustainable development and people's well-being.

Not only do they have a negative impact on society, affecting the growth and prosperity of communities, but they can also cause serious financial and reputational damage to businesses that may incur civil and criminal liability, penalties and lose their license to operate.

We are committed to conduct our activities fairly, honestly, and transparently and to adhere to the highest standards of ethical conduct in strict compliance with applicable legal and regulatory requirements, as well as our clients' requirements and the initiatives we voluntarily subscribe to.

2. GOAL, SCOPE, AND RESPONSIBILITIES

The Organization has an attitude of zero tolerance regarding bribery, corruption, and facilitation payments.

The Organization decided to adopt and implement an Anti-bribery and Corruption Policy, hereinafter referred to as "Policy" to prevent and mitigate the risk of corruption and related practices, reaffirming our commitment to contribute to the fight against corruption in all its forms including extortion and bribery.

This Policy applies to all employees and members of the Management Board of the Organization and its Partners, regardless of their link and geographical location.

The Management Board shall be responsible for the implementation of this Policy and its adopted implementing measures.

3. DEFINITIONS

CONFLICT OF INTERESTS

Situation which occurs when a person faces a choice between professional duties and his or her personal interests, jeopardising his or her objectivity.

THING OF VALUE

Anything, monetary or otherwise, that benefits the person including but not limited to favours, loans, payment of expenses or debts, discounts, gifts, entertainment, drinks, meals, travel, and hospitality.

CORRUPTION

The offer, promise, solicitation or acceptance of anything of value, monetary or not, motivated by the practice or omission of acts.

BRIBERY

Accept or offer anything of value with the intention of obtaining a deal or advantage illegitimately.

FACILITATION PAYMENT

Promise, offer, or pay anything of value to ensure the carrying out of action or expedite a procedure.

PARTNER

Supplier of products, services, subcontractors, other natural or legal persons having a commercial relationship with the Organisation.

4. DUTY TO ACT

Bribery and corruption can have very serious consequences including damage to reputation, legal proceedings, and massive financial losses even if the Organisation is not aware of such activities. Accordingly, all business must be conducted in accordance with this Policy.

4.1 PROHIBITED ACTIVITIES

- Promise, give, or accept any kind of bribe regardless of its form, value, and local customs.
- Solicit, offer, or receive, directly or indirectly, money or anything of value for the purpose of influencing any act or decision, securing, or hiring businesses.
- Make, offer, or authorize payments for facilitation to civil servants or private enterprises with the intention of ensuring or accelerating the execution of an action.
- Obtain confidential information about competitors' business opportunities, offers or activities.
- Encourage or coerce a worker to commit or omit an act in violation of his legal and ethical duties.

4.2 GIFTS, HOSPITALITY, AND ENTERTAINMENT

The Organization strongly advises not to offer or receive gifts and hospitality.

Recognising, however, that they are sometimes appropriate and necessary for the development of good trade relations, this practice should be guided by the highest standards of ethics and transparency.

All expenses related to hotels and offers are subject to prior approval and duly registered.

Gifts and hospitality are always forbidden if they:

- Violate the Organization's Code of Conduct and Policies.
- May jeopardize the reputation and good name of the Organization.
- Are illegal activities or products.
- Are in form of cash or equivalent.
- Exceed a value of €200.
- Are given to civil servants, members of government and international organizations.
- Aim to gain undue advantage in business.

4.3 COMPLIANCE OBLIGATIONS

During production, all trims (including labels, buttons, zippers, hangtags, but not only) are duly controlled by the facility's supervisor, who delivers them to employees, per manufacturing order.

All leftover trims and trimmings, collected daily from the factory floor, as well as defective materials, are duly identified, segregated, and safely stored until final disposal.

5. COMPLIANCE OBLIGATIONS

Employees and partners are required to report in writing any situation regarding conflicts of interest.

The Organisation shall establish and maintain strict procedures for the maintenance of detailed records, that adequately and fairly reflect all financial transactions and disposal of assets in accordance with legal requirements and accepted international accounting principles.

Before entering a business relationship with a new partner, the Organisation shall conduct a due diligence procedure and risk analysis of corruption.

6. REPORTING IRREGULARITIES AND WHISTLEBLOWING

We encourage employees to report immediately when they witness or suspect that they may have witnessed, any practice or attempt at corruption and bribery or any activity that is illegal or violates the rules of this Policy.

We guarantee fair treatment and protection against retaliation to employees who refuse to accept or offer any bribes or report in good faith legitimate concerns about irregularities that they have witnessed or that may occur.

The Organization will treat as an infringement of this Policy any act of retaliation against the whistle blower.

7. INFRACTION CONSEQUENCES

Employees who violate this Policy may be subject to disciplinary action and sanctions, including dismissal for just cause. Violation of this Policy by a partner implies the immediate termination of the business relationship.

The Organisation shall report to the competent authorities' facts which may constitute a criminal offence or misdemeanour.

8. TRAINING AND COMMUNICATION

We ensure the training of employees on how to follow and implement this Policy, appropriate to their category and roles.

We communicate this Policy to all stakeholders and raise awareness of all new and existing partners for this Policy.

9. LEGAL FRAMEWORK AND GOOD PRACTICES

The Organization identifies the legal compliance requirements applicable to the countries in which it operates and undertakes to apply and comply with the following laws and arrangements:

- US Foreign Corrupt Practices Act
- UK Bribery Act
- United Nations Convention against Corruption
- International Business Transactions of the Organization for Economic Cooperation and Development
- United Nations Global Compact Principles