



1

ET ERNA

Code of Conduct for Stakeholders of ET ERNA Mode GmbH

(June 2025 / Version 1.7)

PREAMBLE

ETERNA Mode GmbH is committed to social responsibility, sustainability, environmental protection, and fair cooperation, maintaining strict economic, ecological, and social standards. We also expect these principles from our suppliers.

Our Code of Conduct applies worldwide to all production facilities involved in fabric and clothing production that we contract with. This applies to all factories, direct business partners, and other suppliers that produce goods on behalf of ETERNA Mode GmbH. Business partners are obligated to adopt and adhere to the principles of this Code.

The Code defines basic requirements for all suppliers who comply with the standards from OEKO-TEX®SteP, the Business Social Compliance Initiative (BSCI), the International Labor Organization (ILO), and the United Nations Universal Declaration of Human Rights. ETERNA Mode GmbH expects that no violations of human rights and environmental obligations will occur in the upstream supply chain. Suppliers should communicate these principles to their business partners as binding regulations. If a supplier believes that it cannot fulfill a requirement of the Code without violating applicable law, ETERNA Mode GmbH must be notified immediately. Suppliers are also requested to point out any potential negative impacts on human rights and environmental concerns that could arise from their sourcing and purchasing practices when manufacturing products for ETERNA Mode GmbH.

ETERNA Mode GmbH encourages its suppliers to go beyond these requirements and actively strive for continuous improvement and excellence in ethical practices.

2

FAIR BUSINESS PRACTICES

ETERNA Mode GmbH prohibits bribery, extortion, and embezzlement by its own employees and expects the same from business partners. National and international anti-corruption regulations must be observed. The business partner is aware that ETERNA Mode GmbH cannot legally accept bribes. Therefore, the business partner refrains from offering advantages and does not interpret ETERNA Mode GmbH's refusal as an insult. Gifts or invitations should be of minimal value, always be given voluntarily, and under no circumstances should they be offered as a bribe, kickback, or consideration.

The supplier's decisions are based exclusively on objective criteria. Any influence resulting from personal, business, or other conflicts of interest is reported to ETERNA Mode GmbH and avoided from the outset. The stakeholder acts in accordance with international standards against unfair competition and applicable antitrust laws.

1. Legal compliance

All production sites must comply with the strictest national and international laws and regulations, ILO and UN conventions, industrial standards, and all other relevant guidelines. Circumventing compliance with this Code of Conduct and the aforementioned regulations through manipulation of employment conditions or similar measures is prohibited.

The supplier is obligated to report any suspected violation of the Supplier Code of Conduct. The notification shall be made while safeguarding the legitimate interests of the supplier or its subcontractor and respecting the rights of its employees, particularly the protection of trade secrets.

2. Employment relationships

ETERNA Mode GmbH treats its employees with respect and rejects any form of unlawful punishment, abuse, harassment, intimidation, or other degrading treatment of employees. ETERNA Mode GmbH adheres to applicable labor law in all employment relationships and expects the same from our contractual partners. Employees must be provided with clear information about the essential working conditions, including their rights and obligations, as well as working hours, remuneration, payment, and billing arrangements, at the start of their employment. ETERNA Mode GmbH respects and protects the right of employees to terminate their employment relationship subject to the applicable notice period.

3. Discrimination, bullying, harassment or abuse

ETERNA Mode GmbH prohibits any form of discrimination, bullying, harassment, or abuse in hiring and employment practices. This includes any discrimination, exclusion, or preferential treatment based on color, race, caste, ethnic, national, or social origin, nationality, gender, sexual orientation, age, political opinion, religious beliefs, union membership, physical or mental disabilities, or other personal characteristics. It is irrelevant whether such discrimination, exclusion, or preferential treatment originates from the business partner. ETERNA Mode GmbH promotes a work environment that enables inclusion and values the diversity of our employees.

ILO Conventions 100, 111, 143, 158 and 159 apply.

4. child labor

ETERNA Mode GmbH does not tolerate child labor or any form of exploitation of young workers. The minimum age for employment must be 15 years or the age at which compulsory education ends, whichever is higher. National regulations for the protection of child and young workers must be respected, taking into account exceptions provided for by the International Labor Organization (ILO). Strict compliance with the prohibition of child labor and restrictions on the employment of young workers must be ensured. Young workers, in particular, should not be exposed to unsafe or dangerous conditions. In the event of violations of this prohibition, prompt corrective measures must be taken to protect vulnerable children and other young employees. These measures should be documented. In addition, the business partner must implement necessary measures and processes to ensure the rehabilitation and social integration of vulnerable children. They should also ensure that these children can complete their schooling in accordance with national regulations. ILO Conventions 79, 138, 142, 182 and ILO Recommendation 146 apply to these requirements.

5. Forced or compulsory labor

ETERNA Mode GmbH does not tolerate any form of forced or compulsory labor, serfdom, servitude, slavery, or similar conditions. Prison labor is also rejected. It is prohibited to directly or indirectly force employees to work through violence or intimidation. Instead, all employees must have sought their work of their own free will.

ILO Conventions 29 and 105 apply.

6. Prohibition of circumvention of labor and social security law provisions

The supplier shall not resort to subcontracting, subcontracting, homeworking arrangements, training programs or other alternative methods if these serve solely to avoid permanent employment, which would entail obligations for the supplier under labor and social security law.

7. Working hours

Working hours must comply with applicable laws, industry standards, or relevant ILO conventions, whichever is more stringent. The maximum permitted weekly working hours under national law must not be exceeded. Typically, employees' weekly working hours should be limited to 48 hours, with a maximum of 60 hours, including overtime. Individual business and employment models are subject to relevant national and international regulations, including exemptions granted by the ILO. The same principles apply in the event of significant disruption to regular business operations. Employees must be granted at least one rest day after six consecutive working days. Employees must not be forced to work overtime. Separate remuneration, as required by national regulations, is mandatory for overtime worked.

ILO Conventions 1 and 14 apply to these requirements.

8. Freedom of association and the right to collective bargaining

If the law imposes restrictions on freedom of association or the right to collective bargaining, workers must have the alternative opportunity to organize freely and independently to bargain collectively. If this is not permitted, we will seek reasonable compromises for our employees.

ILO Conventions 87, 98, 135 and 154 and ILO Recommendation 143 apply to these requirements.

9. Establishment of complaint and redress mechanisms

The business partner is obliged to establish mechanisms for the prevention, investigation, limitation and remediation of harm to employees, which in particular meet the following criteria:

- easily accessible, trustworthy and fair complaint mechanisms
- Informing all employees about the existence of grievance mechanisms
- transparent process for dealing with complaints
- Possibility of anonymous complaints by employees
- written documentation and involvement of employee representatives if necessary
- no sanctions for employees if they have filed a complaint.

The stakeholder must redress any damage resulting from violations of human rights or environmental obligations in its business area. This applies in particular (but not exclusively) to employees whose rights have been violated. The stakeholder must oblige its direct and indirect business partners to provide redress for any damage resulting from such violations in their respective business areas.

10. Disciplinary measures

Treating employees with respect is fundamental and should be a matter of course. Sanctions, fines, and other penalties or disciplinary measures must comply with applicable national and international regulations and be carried out in accordance with internationally recognized human rights standards. Employees should not be subjected to any verbal, psychological, physical, sexual, or other form of abuse, coercion, or harassment.

11. Health & Safety

ETERNA Mode GmbH adheres to national and international occupational health and safety standards and ensures a safe and healthy working environment to maintain the safety and health of our employees. ETERNA Mode GmbH ensures this by regularly training our employees on all occupational safety-related topics.

Our business partners are responsible for providing a safe and healthy working environment. They must take necessary measures to prevent accidents and health hazards associated with the work performed. To fulfill this obligation, business partners should establish systems capable of identifying, preventing, and addressing potential health and safety risks. Furthermore, they must ensure that employees receive regular updates and training on relevant health and safety regulations and measures and maintain proper documentation of such training. Employees should have access to clean restrooms and sufficient drinking water. If sleeping accommodations are provided, they must be maintained in a clean and safe condition and meet basic needs.

ILO Convention 155 applies to these requirements.

12. Subcontracting

Subcontracting always requires the approval of ETERNA Mode GmbH. If subcontracting becomes necessary, the business partner must ensure that this Code of Conduct is also implemented by all subcontractors.

13. Documentation of the employment relationship

Business partners confirm that the working conditions for their employees (such as start and end dates of employment, working hours, wages, and incentives) for relevant production stages are documented in writing. This documentation should include, among other things, employee names, dates of birth, and, if possible, residential addresses. Direct business partners are responsible for ensuring that such written documentation is also provided by each of their suppliers. Circumvention of national labor and social security regulations is strictly prohibited.

14. Environmental protection

Protecting nature and the environment is an integral part of ETERNA Mode GmbH's business practices. Business partners are obligated to comply with all applicable environmental regulations. They should also continuously strive to prevent and reduce pollution. Procedures and standards related to waste management, handling and disposal of chemicals and hazardous substances, and the treatment of emissions and wastewater must be strictly adhered to. Particular emphasis should be placed on protecting and preserving natural resources such as drinking water and supporting the promotion of environmentally friendly and socially responsible production processes. Business partners must obtain, maintain, and renew all necessary environmental permits and certifications in accordance with local regulations and comply with the operational requirements and reporting obligations therein.

15. Remuneration

When it comes to remuneration for work, ETERNA Mode GmbH complies with statutory or – where applicable – collective bargaining agreements.

Our business partners are responsible for ensuring that the wages paid to employees meet or exceed the legally required minimum wage or applicable industry standards, whichever is higher. Business partners should also consider the wage level required to cover the purchase of necessities for daily living (the "living wage"). It is strictly prohibited to make illegal and unjustified deductions from wages, including those imposed through direct or indirect disciplinary action. Wages should be paid in a form convenient for employees, such as cash or check. Employees should also be provided with comprehensive and regular information about the breakdown of their wages in sufficient detail.

ILO Conventions 26 and 131 apply to these requirements.

16. Living wages

ETERNA Mode GmbH attaches great importance to our business partners actively addressing the issue of living wages. ETERNA Mode GmbH expects its business partners to make systematic efforts to promote living wages and considers this a beneficial basis for successful cooperation. It is of utmost importance that the business partner considers and refers to regional benchmarks. ETERNA Mode GmbH expects open communication and transparency regarding these efforts.

17. Information, communication and training

ETERNA Mode GmbH communicates the contents of the Code of Conduct to its employees, business partners, and other key stakeholders and provides employees with training on specific topics of the Code of Conduct as needed. ETERNA Mode GmbH expects compliance with this Code of Conduct from all employees and our business partners. The Code of Conduct must be freely accessible and visible in the relevant language. The Code of Conduct must be explained verbally to persons who cannot read.

18. Bribery and corruption

ETERNA Mode GmbH has a zero-tolerance policy towards bribery and corruption, and all business partners and their employees are expected to conduct themselves in a manner that avoids personal dependencies, obligations, or interference. ETERNA Mode GmbH expects everyone to maintain a professional approach characterized by fairness and full compliance with applicable national and international regulations. Furthermore, business partners are expected to implement anti-bribery and anti-corruption policies that are followed in all business areas. When gifts are exchanged according to the customs or etiquette of a particular country, care should be taken to ensure that such gifts do not create obligatory dependencies and that applicable domestic regulations are observed. Information about corrupt practices should be reported to ETERNA Mode GmbH (especially the Group Auditing or Corporate Investigation departments) or to the independent external ombudsman.

19. Personal data, protection of confidential information and intellectual property

Eterna Mode GmbH respects the personal rights of its employees, business partners, and customers. Personal data is processed in compliance with applicable data protection laws, in particular the EU General Data Protection Regulation (GDPR), to the extent applicable. Business partners who process personal data on behalf of or on behalf of ETERNA Mode GmbH undertake to comply with all applicable data protection requirements. This includes, in particular, appropriate technical and organizational measures to protect data and ensuring lawful, targeted, and transparent processing.

ETERNA Mode GmbH takes due care to ensure that the trade secrets and other confidential information entrusted to it by our business partners and customers are adequately protected against unauthorized acquisition, use and disclosure, at least in accordance with the relevant statutory provisions for the protection of trade secrets.

ETERNA Mode GmbH respects the intellectual property of all stakeholders and ensures that adequate precautions are taken to protect intellectual property rights when transferring know-how and technologies.

20. Management systems

To effectively implement, ensure, and monitor compliance with the principles of this Code of Conduct, business partners must establish a management system. This system should include clear responsibilities, defined processes, and appropriate documentation. Continuous monitoring of the implementation, enforcement, and improvement of the principles set forth in this Code of Conduct must be documented. Primary business partners are responsible for ensuring that other business partners acting on their behalf also adhere to the policies set forth in this Code of Conduct.

21. Monitoring the Code of Conduct

ETERNA Mode GmbH is responsible for implementing the guidelines of this Code of Conduct. For this purpose, business partners undertake to subject their production facilities to social audits upon request from ETERNA Mode GmbH. Direct business partners guarantee that ETERNA Mode GmbH itself or third parties authorized by ETERNA Mode GmbH may verify the business partners' compliance with the principles set forth in this Code of Conduct for direct business partners or other suppliers working on their behalf.

22. Sanctions and remedial measures

ETERNA Mode GmbH has the authority to monitor and enforce compliance with the principles of this Code of Conduct. In the event of non-compliance, business partners are obligated to take immediate corrective action. ETERNA Mode GmbH will support this and allow sufficient time for such action. It is important to note that ETERNA Mode GmbH reserves the right to terminate the business relationship with business partners, whether direct partners or other suppliers working on its behalf, if they violate the principles set forth in this Code of Conduct. This right remains in effect despite any corrective action.

23. Complaints procedure

ETERNA Mode GmbH has set up a "reporting channel" for information about violations.

The reporting channel aims to provide our employees and stakeholders with the opportunity to anonymously report violations of laws or internal company policies. This ensures the protection of whistleblowers from potential reprisals by the company. ETERNA Mode GmbH thus provides these individuals with a legal basis for uncovering grievances.

Information from whistleblowers can make a significant contribution to uncovering or preventing legal violations. It is important to us to ensure a clear and transparent process for submitting and handling complaints in order to continuously improve cooperation. Reports are treated confidentially and can be submitted anonymously, where possible, using the reporting channels listed below.

Address: ETERNA Mode GmbH

Thomas Sterl
Media Street 12
94036 Passau
Germany

E-mail: csr@eterna.de

Phone: +49 851 9816-195

QR code:



Representing ETERNA Mode GmbH



Dirk B. Heper



Herbert A. Oelke

As a partner of ETERNA Mode GmbH, I acknowledge, confirm, and agree to adhere to the ETERNA Mode GmbH Code of Conduct. I understand that ETERNA Mode GmbH reserves the right to determine consequences within the partnership if this policy is violated. This agreement remains in effect for the duration of our partnership.

Signature

Date

Company name and stamp