



Declaration of Commitment

Code of Conduct of Wilox Strumpfwaren GmbH

For Wilox, economic, ecological and social responsibility are key elements of responsible behaviour. Wilox also expects such behaviour from its suppliers.

This Code of Conduct represents the minimum standards expected by Wilox. It is based on the "Business Social Compliance Initiative" (BSCI), the Conventions of the International Labor Organisation (hereinafter "ILO"), the Universal Declaration of Human Rights of the United Nations, the UN-Conventions on the Rights of the Child and on the Elimination of all Forms of Discrimination, the Principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

1. Scope

This Code of Conduct is an indispensable part of all business relationships that exist in connection with the manufacture and sale of Wilox products. It applies to all direct and indirect business partners of Wilox. All business partners of Wilox are obliged to adhere to the principles of this Code of Conduct. Wilox must be notified in writing immediately in advance if third parties are commissioned, and such third parties must be obliged in writing to comply with this Code of Conduct.

2. Legal Requirements

In the production facilities, the applicable national and international laws and regulations, minimum industrial standards, conventions of the ILO and the UN and all other relevant provisions (hereinafter referred to as "norms" or "standards") must be observed. Compliance must also be based on the actual meaning of the standards and not just for the sake of form.

3. Child labour

Child labour and the exploitation of children and young people are strictly prohibited.

The minimum age for admission to employment must not be less than the age at which compulsory schooling ends and not less than 15 years, unless this is expressly permitted by the ILO exceptions. Compliance with the prohibition of child labour and the restriction of youth employment must be ensured. Young people must not be exposed to dangerous, unsafe or unhealthy situations. In the event of a violation of the prohibition, the business partner must immediately initiate appropriate remedial measures for the children and young people. The remedial measures must be documented. In addition, measures and procedures must be taken that serve the rehabilitation and social integration of the children concerned and enable them to obtain a general school leaving certificate in accordance with national standards. Wilox is entitled to terminate the cooperation without notice, especially in the event of a violation of this No. 3.

In accordance with ILO Conventions 79, 138, 142 182 and ILO Recommendation 146.

4. Discrimination

Discrimination in the employment and occupation of workers is prohibited. In particular, any active or passive distinction, exclusion or preference based on race, caste, skin colour, gender, age, creed, political opinion, membership in an employee organization, physical or mental disability, ethnic, national and social origin, nationality, sexual orientation or other personal characteristics are prohibited.

In accordance with ILO Conventions 100, 111, 143, 158 and 159.

Wilox, Strumpfwaren GmbH is aware of the vulnerable stakeholder groups that are given special consideration in its various production countries. These include migrant workers in China, refugees in Turkey, women and pregnant women.

5. Right of Association and Collective Bargaining

Employees are to be protected from any different treatment that is related to their employment and that is directed against freedom of association. Their right to found associations or organizations of their own choice for the purpose of promoting and protecting the interests of employees, to join or leave them, and to work for them, must be respected. The exercise of employment must not be affected. As far as national legislation restrict the right to organize



and the right to collective bargaining, alternatively at least the free and independent association of employees for the purpose of conducting negotiations must be enabled and permitted.

In accordance with ILO Conventions 87, 98, 135 and 154 as well as ILO Recommendation 143.

6. Forced labour

All forms of forced and compulsory labour, debt bondage, servitude or slave labour, as well as conditions similar to slavery, are prohibited. No employee may be forced into employment directly or indirectly by force and/or intimidation. Employees shall only be employed if they have made themselves available for employment voluntarily.

Employees are not obligated to deposit financial (or other) securities, or identity papers with the employer.

In accordance with ILO conventions 29 and 105.

7. Disciplinary Measures

All employees must be treated with dignity and respect. Sanctions, fines, other punishments or disciplinary measures may only be imposed in accordance with applicable national and international standards and internationally recognized human rights. No employee may be exposed to verbal, psychological, physical, sexual and/or physical violence, coercion or harassment at the workplace.

8. Working hours

The working hours must comply with the strictest requirements under applicable law, industrial standards or relevant ILO conventions. The maximum permissible weekly working time applies in accordance with national legislation. However, this may not exceed 48 hours on a regular basis and no more than 60 hours, including overtime. In addition, the relevant national and international standards, in particular the exceptions of the ILO, apply to individual trades and forms of employment and in the event of serious disruptions to regular operations. Employees are entitled to at least one day off after six consecutive working days. Overtime is to be remunerated separately in accordance with national laws and provisions. Overtime has to be done on a voluntary basis.

In accordance with ILO conventions 1 and 14.

9. Documentation of employment relationship

The employment contract must be signed by both parties, documented and written in a language that the employee understands. The business partners of Wilox guarantee the written documentation of the working conditions (e.g. start and duration of the employment relationship, working hours, wages and allowances) of their employees in relation to the production phases directly affecting them. The name, date and place of birth and, if possible, the home address of the employee must be recorded. The direct business partners also guarantee the corresponding documentation with the other agents they use.

Circumvention of applicable national labour and social security laws and provisions is prohibited.

10. Remuneration

The business partners guarantee that the wages paid to the employees are at least equal to the statutory minimum wage or the minimum wage usually prescribed in the industrial sector, whichever is higher. The wages paid should be sufficient to cover the basic needs of the employees. Illegal and unjustified wage deductions, especially those in the form of direct or indirect disciplinary measures, are prohibited. The wages must be paid out in a manner that is practical for the employee. The employees must be informed regularly and in detail about the composition of the remuneration in an understandable form.

In accordance with ILO Conventions 26 and 131.

11. Health & Safety

The statutory provisions on occupational safety and health protection must be observed. The business partners have to ensure a safe and healthy working environment.

They take the necessary measures to avoid accidents and damage to health that may arise in connection with the activity. For this purpose, the business partners will set up systems to discover and avoid or react to a potential risk to the health and safety of their employees. They also ensure that employees are regularly informed and trained about applicable health and safety standards and safety measures. The business partners must document the above. Clean toilets and sufficient access to drinking water must be provided. If bedrooms are also provided, they must be clean and safe and meet the basic requirements.



Building security must be verified at all times via valid certificates, as well as permits, and made available to Wilox upon request.

In accordance with ILO Convention 155.

11.1 Building and fire protection

11.1.1 The building shall have clearly marked emergency exits and evacuation plans. All escape doors must open outwards. Exits must not be blocked by objects, they must be well-lit, and must be openable at all times by any employee using appropriate devices.

11.1.2 Upon request, Wilox shall be provided with the documents pertaining to the evacuation measures and fire safety drill, as well as the training of employees on the topics of occupational safety and first aid.

11.1.3 The building must at all times comply with the building regulations of the respective country.

12. Environmental protection

Protecting nature and the environment is essential. The business partners must comply with the applicable environmental standards. It is expected that continuous work will be carried out to avoid and reduce environmental pollution. Applicable procedures and standards for waste management, the handling of chemicals and other dangerous substances and their disposal, as well as for emissions and wastewater treatment, must be observed. The protection and preservation of the natural foundations of life must be given special considerations. Environmentally and socially compatible production should be promoted.

The direct business partner shall pass on the COC in its supply chain, and also provides Wilox with the respective documents of its upstream suppliers, such as Detox reports as applicable along the supply chain.

13. Information/ communication

This Code of Conduct is to be displayed in at least the respective national language and shall be freely accessible and clearly visible for all employees of the business partners. In cases of illiteracy, the Code of Conduct must be explained orally.

14. Bribery and Corruption

Any form of bribery or corruption is prohibited. All business partners and their employees must conduct themselves in such a way that there is no personal dependency, obligation or influence. The principles of business conduct should be fairness and compliance with the applicable national and international standards. Furthermore, the business partner introduces an anti-bribery and anti-corruption policy to be followed in all business areas. If gifts correspond to custom and courtesy in a country, it must be ensured that this does not result in any binding dependencies and that the applicable national legal standards are observed. If corrupt behaviour is suspected, this must be reported to Wilox (see paragraph 18).

15. Management systems

The business partners shall establish a management system to implement, comply with and review the principles established in accordance with this Code of Conduct. The management system must contain clear responsibilities and procedures as well as adequate documentation. The documentation, implementation, maintenance and continuous improvement of the principles established in accordance with this Code of Conduct require regular review. The reviews must be documented. The direct business partner ensures that the other agents appointed by him comply with the principles set out in this Code of Conduct.

16. Monitoring the Code of Conduct

Wilox is committed to ensuring that the principles of this Code of Conduct are observed. If Wilox so wishes, business partners are obliged to have a social audit conducted at the production facilities. The direct business partner guarantees that Wilox itself or authorised third parties may, if necessary, carry out the verification of compliance with the principles established in accordance with this Code of Conduct at the direct business partner's premises or those of any other agent appointed by it, in particular, by making unannounced visits themselves, or through authorised third parties. For this purpose, he will name the production facility accordingly and grant Wilox or authorized third parties unimpeded access to all areas.

17. Sanctions and Remedies

Wilox is entitled to monitor compliance with the principles and obligations set out in this Code of Conduct. If non-compliance is found, the business partner is obliged to take appropriate remedial measures immediately. Wilox's



right to terminate business relationships with the business partner is not restricted by this, regardless of whether the direct business partner himself or the other agent appointed by him violates the principles set out in this Code of Conduct.

18. Complaints Procedure

Complaints or reports of violations of this Code of Conduct can be reported to Wilox Strumpfwaren GmbH at any time – also anonymously – at the following email address: csr@wilox.de.

In order to comply with our internal guidelines, any complaint will be submitted to the responsible individual within Human Resources, Procurement and CSR without delay.

The reporting person is required to only report complaints and information about which they believe that the relevant report is correct.

All business partners guarantee that they will refrain from any disadvantageous or disciplinary measures against the reporting person.

19. Compensation

Wilox is very much aware of its responsibility for persons and the environment. All business partners of Wilox must therefore ensure comprehensive compliance with the principles and obligations laid down in this Code of Conduct.

Wilox has developed a comprehensive risk analysis that is updated at regular intervals with new findings (stakeholders, country offices). This serves as the basis for counteracting any risks in a preventive manner and, if necessary, introducing mitigating measures.

We ensure a regular exchange with these stakeholders by permanently accompanying our staff on-site at the production facilities, and by maintaining close contact with employees and the respective management team. Particular attention is paid to vulnerable stakeholders.

If, despite all the processes in place, a damaging incident does occur, Wilox will take appropriate action to seek redress.

In the event of any violation of this Code of Conduct resulting in harm to people and/or the environment, Wilox will also take the necessary measures to hold those responsible accountable and thus achieve the rectification of any damage caused.

The undersigned hereby undertakes to comply with the above principles and obligations towards Wilox Strumpfwaren GmbH. The above principles and obligations are (and shall be) an integral part of all existing and future contracts between Wilox and its business partners

Wolfertschwenden, 04. December 2023

Nikola Just
Executive Director

Herbert König
Quality & Social Compliance
Manager