

GANT Business Partner Code of Conduct

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Amendments	
002	New routine for grievance mechanism

GANT Business Partner Code of Conduct

At GANT we always stay true to ourselves as individuals, to our GANT values and beliefs. We are genuine and respectful towards each other, our consumers and the environment. We are accountable and take personal responsibility. We recognize that we play a role in the development of a sustainable society. Our sustainability work is based on our seven sustainability pillars.

We seek business partners whose policies regarding ethical, social, and environmental issues are consistent with our own, and the purpose with this document is to make the business partners aware of our commitments and expectations. GANT 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, labour 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, joint venture partners, distributors, vendors, consultants, landlords, agents, service providers and 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. If applicable international and national laws, regulations and conventions are stricter than this Code, they shall prevail.

As a business partner to GANT, you should read and comprehend the content in GANT Business partner Code of Conduct and comply with it in all business with GANT. A business partner also takes the responsibility to inform all our concerned employees about the content in the Code and to make 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.

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 & Labour Rights

In accordance with the ILO Conventions, the United Nations' Universal Declaration of Human Rights, the UN's Conventions on children's rights and the elimination of all forms of discrimination against women, the UN Global Compact and the OECD Guidelines for Multinational Enterprises, U.K. Modern Slavery Act and other relevant internationally recognised agreements, the GANT Business partner Code of Conduct aims to attain compliance with certain social and environmental standards. By signing the Code companies /suppliers are, within their scope of influence, committed to acknowledge the social and environmental standards laid down in this Code and to take appropriate measures within their company policy for their implementation and compliance.

1.1 Freedom of Association and the 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 operation 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 workers 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).

1.3 Humane Treatment/Anti-Harassment and Abuse

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.

1.4 Prevention of Involuntary 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.

1.5 No Child Labour

GANT does not accept child labour. A child is defined as a person younger than 15 years of age, 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. If child labour is detected in the production of goods for GANT the business partners is obliged to offer a sustainable solution in the best interest of the child.

Special protection for Young workers/ Juvenile Worker Protections

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 workers to work overtime.

1.6 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 on the basis of collective bargaining, whichever is highest. Wages, overtime 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.

1.7 Working Hours

Business partners shall set working hours in compliance with applicable laws, and regular working. A workweek shall be restricted to 60 hour, including overtime. Workers shall take at least one day off every seven days except in emergencies or unusual situations defined by the ILO. Regular work week shall not exceed 48 hours, all overtime must be voluntary.

1.8 Labour Contract

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

1.9 Working Conditions/ Health and 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 workers and have a clear set of regulations and procedures to be followed. All personnel shall have the right to remove themselves from imminent serious danger without seeking permission from the company.

Working and Living Conditions

Business partners shall provide access to potable water and clean toilette 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.

Health and Safety Communication

Business partners shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the factory.

2. Environment

Business Partners shall conduct business in a responsible way with as little impact on the environment as possible. The business partners shall introduce and maintain a suitable environmental management system or equivalent to minimise environmental risks, and continuously improve the company's environmental performance. They are committed to the efficient use of raw materials, energy and other natural resources.

2.1 Resource management

Business Partners shall strive to reduce their energy and water consumption to minimize its operations impact on the environment by setting reduction targets, monitoring energy and water use and reviewing the targets regularly. Renewable energy sources shall be promoted.

2.2 Environmental laws and regulations

Business partners should comply with existing environmental legislations and obtain all legally required permits, licenses and registrations applicable for their business. GANTs Environmental Policy states that all employees, partners and business partners show respect for the environment in their decisions and strive to minimize any negative impact on the environment. Procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, waste water, emissions and effluent treatment must meet or exceed minimum legal requirements.

2.3 Animal welfare

Business partners must follow national and international legislation on animal welfare. Breeders and all parties handling the animals should adhere to the Five Freedoms defined by EU Farm Animal Welfare Council/World Organisation for Animal Health (OIE). Materials must not originate from vulnerable or endangered species. All parties involved, handling the animals and/or the materials, should follow national and international legislation regarding forbidden materials. They must also respect and follow international agreements, such as the Convention of International Trade in Endangered Species (CITES).

2.4 Disposal of GANT goods

Handling GANT goods should always be made with a conscious approach. A GANT product should always be handled according to the EU Waste Hierarchy and never be disposed of in a landfill or burnt.

3. Ethical Business Behaviour

GANT expects the highest standards of ethical conduct in all of our businesses. Business partners shall always be ethical in every aspect of its business, including relationships, practices, sourcing and operations. All business carried out with or on behalf of GANT should always be conducted in accordance with GANT's Code and applicable laws and regulations in the country of business.

3.1 Bribery and corruption

GANT has a zero tolerance policy on bribery and corruption. This applies to all the Company's business and transactions in all the countries in which GANT and its business partners operate. GANT does not tolerate bribery in any form and commits to a strong anti-corruption program, including this Code. GANT is determined to ensure that the objectives of this Code are fulfilled and will therefore further instruct and educate all concerned employees as well as business partners to secure their knowledge and compliance with the principles in this Code.

Under this Code a bribe includes financial or other advantages which are given, promised, offered, accepted, requested or received with the intention to influence the ability to make objective and fair business decisions. As a business partner to GANT, you must not carry out any actions involving bribes when you act in connection with the GANT's business.

Facilitation payments are not permitted when acting for or on behalf of GANT.

Whether an action constitutes a bribe is determined by the standards set forth herein. Any local practice or custom will thus be disregarded, unless explicitly permitted or required by local written law.

3.2 Advantages

GANT does not allow its employees or other representatives to request, accept, arrange, offer or give any kind of advantage in connection with Company's business. In accordance GANT has a strict no-gift policy. GANT particularly wishes to point out that employees or other representatives of GANT are not allowed to take any commission from GANT business partners. Should any of GANT's employees or representatives openly or implied, ask for a commission or advantage of any kind, you are advised to immediately inform GANT.

In the conduct of company business it is a violation of GANT's GANT Business partner Code of Conduct if a business partner offers any kind of advantage to an employee of GANT or other GANT representatives.

The term 'advantage' may include – but is not limited to – the following: gift, loan, money (regardless currency), fees, reward, journeys, services, bonuses, lavish meals, vouchers of any kind, product samples for personal use, event tickets, discount on private purchases ,sponsoring or any kind of personal favours.

Employees at GANT are not permitted to give or offer anything of value to anyone for the purpose of obtaining or retaining an unfair business advantage. This could be, but is not limited to, for

example cash, gifts to family members, forgiveness of debts, loans, entertainment, meals and travel, political and charitable contributions, business opportunities and medical care.

It does not matter whether the person to whom the advantage is offered, promised or given is the same person as the one who is to perform, or has performed, the relevant action. Further it does not matter whether the advantage is given directly or by a third party, the recipient is in breach of this Code regardless of the fact that he or she receives the advantage directly or through a third party or if another person is the genuine beneficent.

Be aware that GANT does not allow the offer or receipt of hospitality whenever such arrangements could affect the outcome of business transactions i.e. the purpose is to obtain or retain business with GANT.

3.3 Anti-trust and competition

In GANT, we conduct business in accordance with all applicable antitrust/competition laws. These laws prohibit agreements or understandings between competitors that may restrict competition (agreements on price, markets or customers, price discrimination etcetera).

3.4 Counterfeiting

You acknowledge that the production of counterfeits is illegal and hinders the economic and social well-being of employees. You shall refrain from knowingly having your employees participate in the development, production, or marketing of counterfeits. You shall systematically alert Gant when you have knowledge of Gant brand or product counterfeits. You shall include this obligation in all your subcontracting agreements.

4. Monitoring and Compliance

You should read and comprehend the content in GANT Business partner Code of Conduct and commit to comply with the policies and procedures mentioned in the Code. You have the responsibility to inform all your employees, involved in the GANT business, about the content in the Code to secure their compliance. In addition you also have the responsibility to inform all related subsidiaries and subcontractors about the Code to secure their awareness and possibility to comply.

4.1 Grievance mechanism

GANT has a grievance mechanism in place which is accessible to both internal and external stakeholders to GANT. Conduct that violates this Code of Conduct or that is breach against law should be reported to GANT. To report grievances please use the following link <https://whistleblowing.gant.com>.

The person(s) raising an alert regarding non-compliance with Ethical Guidelines and/or Policy activities aimed at combating non-compliance or breach of the law will be protected from victimization or any other detrimental treatment if they come forward with serious concerns, provided that they have followed the procedure and provided that alerts are raised in good faith.

4.2 Monitoring and compliance

GANT expects its business partners to respect the Code of Conduct and to actively do the utmost to fulfill GANTs requirements in their own organisation and throughout their supply chain. This should be done by cooperating in a transparent manner, by 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 our goods at any time, either by GANT or by an independent third party of our choice. If GANT determines that a production unit is violating this Code, we expect the business partners 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.

A deliberate violation of the Code may lead to termination of all business connections with GANT. Since most sections of the Code follow the law in each country where GANT operates, any deliberate violation of the Business Partner Code of Conduct may be a criminal act.

GANT is committed to continuously review and update its policies and procedures, therefore this Business Partner Code of Conduct can be subject to modification. GANT will inform you whenever there are any major changes or updates in the Code.