



# SUSTAINABLE FOR TOMORROW.

CODE OF CONDUCT

INSPIRED BY YOUR JOB.





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## CODE OF CONDUCT

We, the company Paul H. Kübler Bekleidungswerk GmbH & Co. KG, are committed to our social responsibility. Driven by our responsible awareness of the social, ecological and economic design of the entire value chain, we are facing up to the challenges of an increasingly networked and global economy.

Our Code of Conduct is based on the internationally recognized principles for the protection of human and labour rights as set out in

- The United Nations (UN) Universal Declaration of Human Rights
- The Sustainable Development Goals (SDGs) of the United Nations
- The UN Guiding Principles on Business and Human Rights
- The ILO core labor standards
- The United Nations Convention on the Rights of the Child
- The OECD Guidelines for Multinational Enterprises

In addition, our Code of Conduct is based on relevant international agreements on environmental protection.

With this commitment, we support the goal of enforcing and improving human rights, labor, social and environmental standards in economic value creation processes.

## 1. SOCIALLY RESPONSIBLE CORPORATE GOVERNANCE

### Compliance with law and order

We, the company KÜBLER, comply with the laws of all countries in which we do business. We take care to comply with the principles of the present Code of Conduct in our own actions – in particular in countries with a weak governance structure – and also encourage our business partners to do likewise. Where current national provisions are in contradiction with the content of the Code or the domestic context makes it impossible to meet the responsibility for respecting human rights without restriction, we nevertheless find ways of complying with the principles on internationally recognized human rights and the content of the present Code of Conduct.

### Contribution to society

We, the company KÜBLER, regard ourself as part of the societies in which we do business. Through our business activities, we contribute well-being, advancement and sustainable development in these societies. We take into consideration indirect and direct effects of our business activities on society and environment, and endeavor to bring them into an appropriate balance of economic, social and ecological interests. We respect and accept the different legal, societal, cultural and social backgrounds of the countries into which our value creation chain extends, and recognize their structures, customs and traditions. Insofar as the latter are in conflict with the principles set out here, we will enter into dialogue with our business partners and strive for understanding and acceptance.

### Ethical business conduct and integrity

We, the company KÜBLER, engage in legal business practices taking account of fair competition, intellectual property rights of third parties as well as antitrust and competition rules. We reject all forms of corruption and bribery and promote in an appropriate manner principles of responsible business management such as transparency, accountability, responsibility, openness and integrity. Business partners must be treated fairly. Contracts are complied with insofar as the framework conditions do not change fundamentally. Generally, ethical values and principles have to be respected; this applies in particular for human dignity and internationally recognized human rights.

## 2. RESPECT OF HUMAN RIGHTS

The protection of human rights is the duty of the countries in which we are economically active. In support of the state's duty to enforce human rights on its territory, we, as KÜBLER, respect human rights. Through our activities, we avoid compromising the human rights of others and counteracting adverse human rights impacts in which we are involved.

To meet the our responsibility to respect human rights, we exercise due diligence in the area of human rights with regard to the risk of serious human rights impacts and the nature and context of our business activities. Due diligence includes procedures to identify, prevent, mitigate and, where appropriate, remedy potential adverse human rights impacts and extends to those adverse human rights impacts that we cause or contribute to or that are directly linked to our business activities, products or services as a result of our business relationships

### 3. LABOR RIGHTS AND WORKING CONDITIONS

We, the KÜBLER company, follow the core labor standards of the International Labor Organization and create a safe and decent working environment.

#### Freedom of association and right to collective bargaining

We, the company KÜBLER, respect the right of the workers and employers to form organizations of their own choosing - without prior authorization - which support and protect the interests of the workers. The enterprises also respect the right of workers and employers to engage in collective bargaining regarding wages and working condition. Workers may not be disadvantaged due to occupation or membership in workers' organizations.

In countries where the principles regarding freedom and right of association, as well as collective bargaining, are not adhered to i.e. the practice of these rights are limited or forbidden, we are to allow our workers to elect representatives with whom they are able to enter a dialogue regarding workplace issues. The company KÜBLER respects the rights of the workers to put forward complaints without being disadvantaged in any way. These complaints are handled with a suitable procedure.

#### Prohibition of forced labor

We, the company KÜBLER, do not accept any economic activity based on forced labor, bonded labor or serfdom. This encompasses any type of work or service demanded of a person under the threat of punishment and for which that person has not voluntarily made himself or herself available

#### Prohibition of child labor and protection of young workers

We, the company KÜBLER, are committed to the effective abolition of child labor. We observe the respective legal minimum age for admission to employment or work, which, according to the provisions of the International Labor Organization, may not be below the age at which compulsory schooling ends and not below 15 years of age.

As part of the recruitment process, appropriate mechanisms for determining age prevent child labor. If we identify child labor, we will take the necessary remedial and social reintegration measures that focus on the welfare and protection of the child. We only employ young people from the age of 16 if the nature or conditions of the work they perform do not endanger the life, health or morals of the young people concerned and they receive appropriate, relevant instruction or vocational training in the relevant sector.

#### Prohibition of discrimination in employment and occupation

Any form of discrimination, exclusion or preference based on ethnic origin, skin color, gender, religion, political opinion, national origin or social background that has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation shall be prohibited. Furthermore, the principle of equal pay for male and female workers for work of equal value shall apply. We treat our employees with dignity and respect. Any form of undignified treatment, such as abuse, sexual harassment and gender-specific violence, is refrained from. Disciplinary measures are recorded in writing and in an understandable form.

#### Working hours

Insofar as applicable national laws or applicable workplace agreements do not specify a lower maximum working time, regular weekly working time does not exceed 48 hours plus a maximum of 12 hours of overtime. Overtime will be remunerated at no less than the rate laid down by law or collective agreement and has to be required only in exceptional cases. We grant our employees the right to rest periods on each working day and recognize important statutory holidays. A work-free day has to be granted after six consecutive days of work.

## Remuneration

State or collectively agreed minimum wages must not be undercut. We, the KÜBLER company, take into account that in countries without a collectively agreed or statutory wage framework, wages for regular full-time work must be sufficient to meet the basic needs of employees. At the same time, we know that the KÜBLER company alone cannot ensure a livelihood that is commensurate with human dignity, but that supplementary state benefits and other social protection measures may be necessary.

As we recognize a living wage as a human right, we are constantly reviewing the standards in the countries concerned in accordance with the specifications of our certification partners. We try to obtain an overview of current wage levels by collecting evidence of actual wages paid in order to compare them with recognized published reference values. The aim is to develop joint solutions through trust-based exchanges with our partners and suppliers in order to promote living wages and prevent financial exploitation of employees along our supply chain. Fair and transparent dealings are essential here. Wages are not withheld and are paid regularly in a form that is suitable for the employee. Deductions from wages are only permitted within the legal or collectively agreed framework and are to be excluded.

## Employment relationships

The rules of national labor law must be complied with. Employees must be provided with comprehensible information on the main working conditions, including working hours, remuneration and payment and settlement modalities, remuneration as well as payment and accounting modalities. KÜBLER protects the right of employees to terminate their employment relationship in compliance with the relevant notice period. We also endeavor to promote the professional qualifications of employees.

## Occupational Health and Safety

We, the KÜBLER company, are obliged to take appropriate measures to ensure health and safety in the workplace, considering national requirements, in order to prevent accidents at work and protect the health of our employees within the scope of our activities.

Applicable local regulations on occupational health and safety, health and safety in the workplace, building safety and fire protection are complied with in order to minimize the risk of accidents and occupational illnesses. Where necessary and appropriate, employees are provided with suitable personal protective equipment (PPE). In situations of immediate

danger, employees have the right and the duty to leave their workplace immediately and without permission. Vulnerable persons such as young workers, young mothers and pregnant women as well as people with disabilities are given special protection.

## Employment of Security Forces

The use of private or public security forces to protect the company's own business activities should only take place on the condition that they are sufficiently trained and that there are no potential violations of human rights.

## 4. PROTECTION OF ENVIRONMENT & WILDLIFE

We, the KÜBLER company, comply with the applicable laws, regulations and administrative practices for the protection of people and the environment in the countries in which we operate. We generally conduct our business activities in such a way that they contribute to the general goal of sustainable development. KÜBLER requires itself and its partners along the value chain to always use resources and raw materials responsibly. Waste must be avoided, and the constant optimization of resource use, energy consumption and the proper disposal and recycling of waste must be always exemplified. We always demand compliance with applicable standards and environmental regulations. We have

defined our climate targets for 2030 in our management objectives and are working on continuous implementation to achieve them.

We are in contact with external service providers to record our annual CO<sub>2</sub> emissions with the aim of constantly reducing our footprint. We are also committed to the proper disposal of our waste in order to minimize the impact on the environment and to keep materials in the cycle of use. We are committed to the continuous and long-term improvement of our environmental performance by promoting the introduction of appropriate technologies and production processes that enable the efficient use of natural resources. We strive for a continuous reduction in water consumption and its pollution, as well as an increasing share of environmentally friendly energy sources. Chemicals used throughout the production process are evaluated by independent certifications, and also selected according to environmental, occupational health and safety and consumer protection aspects. In case of particularly risky substances, an alternative solution is sought. We also adhere strictly to national and international legal requirements.

We, the KÜBLER company, observe the principles of animal welfare in our business activities. Animal husbandry and use must be species appropriate. We recognize the Washington Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and align our business activities accordingly.

## 5. CONSUMER INTERESTS

We, the KÜBLER company, take appropriate measures to guarantee the quality of the products we offer. We ensure that our products comply with all legal regulations regarding the health and safety of consumers and are safe and harmless to health for their intended use. KÜBLER also takes the interests of consumers into account in information and sales measures by applying fair business, marketing and advertising practices and promoting consumer education.

## 6. DATA PRIVACY & COMMUNICATION

We, the Kübler company, treat personal data with extraordinary care to ensure compliance with the GDPR. The use and distribution of such data must be carried out exclusively within the scope of business and lawful purposes. Confidential information from KÜBLER and partners and its distribution must be treated with the utmost care at all times. To this end, all employees are informed about the associated rights and obligations within the company and sensitized to the correct handling of personal data. New employees must commit to the company's own data protection guidelines, changes to these are communicated internally to all employees and additional training is provided.

The contents of the Code of Conduct are communicated to employees, contractual partners and, if necessary, third parties. It must be clear to the contractual partner that compliance with the Code of Conduct is fundamentally guaranteed. However, the disclosure of trade and business secrets or competition-related or other sensitive information is excluded from this for legal reasons.

## 7. COMPLAINT MECHANISM

Concerns regarding the successful implementation of our Code of Conduct as well as significant violations of legal provisions and our values or requirements must be reported to us immediately by our business partners and their employees. We have set up a contact point for this purpose, where information can also be sent to us anonymously if desired. In the event of suspicions or complaints, please send an email to the following address: [social@kuebler.eu](mailto:social@kuebler.eu). We are committed to complying with corporate due diligence obligations and process every report. Sensitive information will of course be treated confidentially.

## 8. IMPLEMENTATION

We, the KÜBLER company, respect this Code of Conduct in our own actions. We encourage our business partners to apply the Code of Conduct accordingly. We support our business partners in shaping their supply chain in such a way that human and employee rights are respected and working conditions are continuously improved.

In the interests of good corporate governance, we embed the principles of responsible corporate governance set out in the Code of Conduct in our strategic and operational management systems.

Plüderhausen, 01.04.2025

A handwritten signature in black ink, consisting of several vertical strokes and a horizontal line extending to the right.

Richard Scheiner  
CEO

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Signature supplier





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