

Peek&Cloppenburg

# Code of **Conduct**

WE CARE  
TOGETHER

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# This Code of Conduct summarises our most important rules and principles of behaviour, thus forming our ethical and value-based foundation.

The Peek & Cloppenburg\* Group (Düsseldorf/Vienna) has been known in the fashion industry as a family-run trading company for over 120 years. What began in 1900/1901 with two P&C stores in Düsseldorf and Berlin now extends to over 160 stores in city centres in 16 European countries and includes the online business with five shops. Besides P&C, with its headquarters in Düsseldorf and Vienna, the group includes the men's outfitter ANSON'S and Magasin du Nord, as well as other subsidiaries such as logistics, IT and the exclusive brand business.

## Dear employees and business partners,

As one of the leading omnichannel fashion retailers in Europe, the Peek & Cloppenburg Group (Düsseldorf/Vienna) is committed to responsible corporate management. We take this responsibility towards our employees, society and the environment seriously by bundling all measures for transparent and credible sustainability within our group under our We Care Together initiative. It is important to us that Peek & Cloppenburg KG, Düsseldorf is perceived consistently and as a responsible company. We want to be measured by concrete results. In the three fields of action People & Company, Product & Customer and Planet & Climate, we transparently commit to implementing concrete measures for a better tomorrow.

This Code of Conduct summarises our

most important rules and principles of behaviour, thus forming our ethical and value-based foundation. It applies to all employees of Peek & Cloppenburg KG, Düsseldorf and its subsidiaries, regardless of their respective position or individual area of responsibility. We are convinced that together, based on this guideline, we can contribute to the continued growth of our company and protect the reputation of Peek & Cloppenburg as an attractive employer, reliable business partner and fair competitor.

Best regards,



Alexander Deopito and Uwe Fehr  
Management, Peek & Cloppenburg, Wien

# Social responsibility

All human beings are born free and equal in dignity and rights.

Article 1, sentence 1 of the Universal Declaration of Human Rights

## **1.1 Human rights**

We all have the right to be treated with respect, so we observe and respect internationally recognised human rights as fundamental and universal requirements. These apply not only to cooperation within our company but also to the behaviour of and towards our customers and business partners. Therefore, as part of our We Care Together initiative, we implement a human rights strategy whereby we commit to promoting respect for human rights worldwide. We treat our employees with appreciation and reject any form of harassment, unlawful punishment or intimidation.

## **1.2 Equal treatment**

Peek & Cloppenburg firmly believes that all people should be treated equally. In this regard, we place the highest de-

mands on our employees and expect the same from our business partners. This particularly concerns measures against discriminatory behaviour on the grounds of ethnic origin, national origin, religion, gender, sexual orientation, age, pregnancy, physical or mental disability, or membership in a union.

## **1.3 Working conditions**

We place great value on a people-centred company culture and fair working conditions. Our wages and salaries are gender-independent, comply with at least the respective statutory minimum wages and are paid in accordance with agreements. We adhere to reasonable, industry-standard working hours, including overtime, breaks and holiday, and observe statutory working time regulations.

#### **1.4 Child labour**

We do not tolerate child labour and do not employ young people who do not meet the legally prescribed minimum age. When employing those under 18, we pay particular attention to the rights of young workers.

#### **1.5 Forced labour**

We do not accept any form of forced or compulsory labour, including any form of serfdom, debt bondage, slavery or similar practices, human trafficking or any other involuntary labour and services that are incompatible with internationally recognised labour and social standards. This includes, in particular, the strict prohibition of torture and cruel, inhumane or degrading treatment.

#### **1.6 Occupational health and safety**

We take our responsibility for our employees' health and safety seriously. We

observe national and international occupational health and safety standards and ensure that our employees have a safe and healthy working environment at the workplace, e.g. in the store, warehouse or headquarters. To this end, we take necessary precautionary measures and conduct regular risk assessments to prevent accidents, injuries and other harm to health. Additional protective measures are also taken for pregnant employees.

#### **1.7 Freedom of association**

We respect our employees' right to freedom of association and assembly, as far as permissible and possible under local law. This includes, among other things, forming, joining and belonging to employee representative bodies (works councils). We will not tolerate any form of discrimination based on the exercise of these rights.



# 2 Ecological responsibility

We bear responsibility for the environmental compatibility and sustainability of our products.

## 2.1 Protection of the environment and climate

Peek & Cloppenburg takes its ecological responsibility seriously and is aware of its status as a role model in society and the fashion industry. We adhere to the applicable legal requirements and recognised standards for protecting the environment and climate and take appropriate measures to avoid and protect against hazards and impacts that affect them. We strive to handle resources sparingly in production, packaging, transport and logistics, to reduce the consumption of raw materials and gradually switch to more sustainable alternatives. This also includes avoiding harmful soil changes, water pollution, air pollution, noise emissions or excessive water consumption. As part of our We Care Together initiative, we are developing a climate strategy at Peek & Cloppenburg to reduce our CO<sub>2</sub> footprint. We also pay attention together in our stores, warehouses and headquarters to avoid and minimise negative impacts on the climate, for example with our company-wide #WeSaveEnergy campaign.

### **2.2 More sustainable products**

We bear responsibility for the environmental compatibility and sustainability of our products. Consequently, we want to increase our share of fairly produced and resource-saving fashion. Against this background, we are continuously expanding our range of more sustainable products. In the near future, at least 20% of our third-party and exclusive brand range should have labels from the company's own label standard, enabling our customers to make more responsible purchasing decisions. We also want to provide guidance and strengthen the credibility of our commitment to sustainability with further concrete measures in the Product & Customer area of our We Care Together initiative.

### **2.3 Global perspective**

Besides taking into account the effects of our supply chains, our global environmental responsibility also includes compliance with the requirements of international agreements applicable to us. These include the Minamata Convention (risks associated with the production and disposal of mercury-containing products), the POP Conventions (risks associated with the production or use of certain persistent organic pollutants) and the Basel Convention (risks associated with importing and exporting waste). Here, too, we observe the applicable regulations.

Since 2003, we have been part of the amfori Business Social Compliance Initiative (BSCI), which aims to improve social standards and working conditions in our global value chain.

### **2.4 Company resources**

We always use the resources provided to us by Peek & Cloppenburg conscientiously. This applies beyond ecological resources to financial resources and all other assets, such as devices provided to perform our tasks. Such resources must be protected against loss, misuse or unnecessary consumption.



# Business integrity

Compliance with laws and regulations is a matter of course for Peek & Cloppenburg and all its employees.

### **3.1 Lawful behaviour**

Violations of the law must be avoided under all circumstances. All employees must therefore be familiar with and understand the legal regulations and internal guidelines relevant to their area of responsibility. Their respective supervisor and the Legal & Compliance department are available to provide support and advice.

### **3.2 Corruption and money laundering**

We prohibit any form of corruption, bribery or other unauthorised acceptance or granting of benefits. Personal benefits of monetary value in exchange for preferential treatment in business must not be offered, promised, granted or approved. Laundering unlawfully obtained money or other assets into the economic cycle is a criminal offence almost everywhere in the world. It is also criminal to use funds or other means derived from terrorist offences or provided to support terrorist

activities. This applies even in cases of unknowing or unintentional involvement. Therefore, we comply with legal requirements for the prevention of money laundering and terrorist financing.

### **3.3 Free and fair competition**

Peek & Cloppenburg prioritises adherence to applicable antitrust and competition laws, as this is the only way to promote, support and protect free and fair competition. We do not enter into agreements with competitors that impair free and fair competition, nor do we exchange competitively sensitive information. Moreover, under no circumstances do we discuss prices that can reveal information about market behaviour. Reference documents are available to our employees for safe interaction with suppliers or competitors.





### **3.4 Data protection and intellectual property**

We protect and handle the personal data of customers, business partners and our employees with the utmost care. It is important to us to comply with the legal requirements for processing personal data and to make our employees aware of how to handle it.

We respect and protect the intellectual property of others, as well as the trademarks and copyrights of exclusive and third-party brands. Photos, articles, films, logos, etc. may only be used if Peek & Cloppenburg is authorised to do so.

### **3.5 Conflicts of interest**

Decisions should always be made objectively in the interest of Peek & Cloppenburg and never be influenced by personal interests or business relationships. We attach great importance to

our employees being transparent in this regard and avoiding or promptly disclosing conflicts of interest.

### **3.6 Social media and trade secrets**

Respect, tolerance, honesty and integrity towards employees, customers, business partners and the general public also apply to our dialogue on social media. As members of the company, we therefore always express ourselves respectfully and professionally. Furthermore, strict information security standards are essential for our business success. They help us maintain our customers' and business partners' trust in our services and ensure our business continuity. Internal matters and trade secrets therefore remain internal, and in particular we do not publish confidential or internal data and information on public social networks.



# 4 Contact persons

Together we  
protect the company  
by addressing  
misconduct.

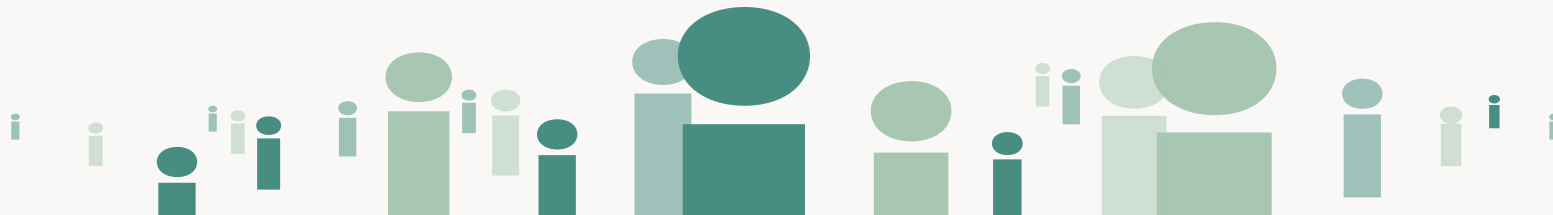
Our employees have various points of contact available to them if they observe a potential violation of internal or external regulations. They always have the option to personally approach their supervisor or the Legal & Compliance Department. Additionally, in collaboration with our partner EQS Group, employees have access to a whistleblowing system in various languages where they can digitally submit reports on potential violations:

[peekcloppenburg.integrityline.com](https://peekcloppenburg.integrityline.com)

The whistleblowing system is managed by trained staff of the Legal & Compliance Department. All reports are treated confidentially. The primary goal of a whistleblowing system is to protect the whistleblowers and our company. Any

form of retaliation against whistleblowers will not be tolerated by Peek & Cloppenburg and is itself a violation subject to sanctions. If an investigation reveals that a person was knowingly falsely accused, defamed or denounced in a report, this too constitutes a violation and will be sanctioned accordingly. Further information on handling reports can be found on the linked website of the electronic whistleblowing system.

For any questions or suggestions regarding this Code of Conduct and the Compliance Programme of Peek & Cloppenburg, all employees can always contact their supervisor or the Legal & Compliance Department.



**Together**  
for a better tomorrow.

**Peek&Cloppenburg**