

Policy Statement on Respect for Human and Environmental Rights

1. Understanding and position

Jeans Fritz Handelsgesellschaft für Mode mbH is committed to respecting human rights and protecting the environment in its global supply chain and in its own operations.

As part of our commitment to being a responsible business, we have human rights and environmental due diligence processes in place within our organisation and in our relationships with our business partners.

Jeans Fritz has defined specific requirements for employees, suppliers and business partners in a Code of Conduct to ensure respect and compliance with human rights and environmental protection. This Code of Conduct is the basis for responsible and ethical behaviour.

2. International standards and guidelines

Jeans Fritz Handelsgesellschaft für Mode mbH respects the following international standards and guidelines:

- United Nations Universal Declaration of Human Rights
- ILO Core Labour Standards
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- UN Social and Civil Pact
- Stockholm Convention

The values and standards set out in these standards form the basis of our Code of Conduct and provide a binding framework for all employees, suppliers and business partners.

3. Implementation of the due diligence process

Jeans Fritz Handelsgesellschaft für Mode mbH has implemented a risk management system to ensure compliance with and protection of human and environmental rights. This includes the following processes: Risk analysis, preventive and corrective measures, complaints procedures and documentation.

We identify, analyse and prioritise human rights and environmental risks in our own operations and in our supply chain, and develop measures to prevent, eliminate or minimise human rights and environmental risks as part of our due diligence processes. The effectiveness of the measures is regularly reviewed.

Risk analysis:

A risk analysis is carried out once a year and on an ad hoc basis. The first step is an abstract risk assessment, where we identify and evaluate country and sector-specific risks based on their severity (scale, scope, reversibility) and likelihood of occurrence. Reports from independent organisations and the media are very important. We use the online tool from CSR Risiko-Check (legal owner MVO Nederland) for this purpose.

We carry out a concrete risk assessment in the second step. This is an assessment of the likelihood of a human rights or environmental violation and the severity of the impact on people. We focus our analysis on production sites, as the risk of human rights violations is higher there than with our direct suppliers. For the most part, our direct suppliers are importers/exporters, purchasing offices or agencies.

We have identified and prioritised the following risks in our main sourcing countries, Bangladesh and China:

- Working conditions (working hours/overtime, employee rights)
- Occupational protection & safety

We have assessed the risk as medium in Bangladesh and high in China.

In order to raise awareness of compliance and integrate measures, the results of the risk analysis are regularly presented to management and the purchasing department.

Preventative and remedial measures

Based on the risks identified and our ability to influence them, we take appropriate measures to ensure respect for human rights and compliance with environmental standards. The following measures can be both preventive and corrective:

- Agreement on contractually appropriate control mechanisms such as supplier audits, waste water tests, and tests for harmful substances.
- Social and environmental seal
- Jeans Fritz Code of Conduct for suppliers and employees
- Consideration of minimum requirements on human rights and environmental risks when selecting new suppliers and producers
- On-site supplier visits
- Membership of the Better Cotton Initiative to jointly improve environmental and social standards in cotton production
- Implementing appropriate purchasing practices, such as establishing long-term partnerships with suppliers and manufacturers / ensuring sufficient and appropriate delivery times / cancelling orders only in exceptional cases

Complaints procedure:

Risks or violations relating to human rights and environmental issues can be reported anonymously via our online complaints channel (<https://jeans-fritz.vispato.com/>). This complaints channel is used as an early warning system to detect violations in the company's own business area or in the value chain and is open to all persons, Jeans Fritz employees and third parties. Jeans Fritz employees can also make written or oral complaints to the works council.

We will take appropriate action in the event of a breach. After a thorough examination of the complaint, an action plan is drawn up with all parties involved in order to minimise or eliminate the risks that have arisen. In addition, effective preventive measures are developed and implemented to prevent future injuries. Our aim is to resolve every complaint together with those affected and those responsible.

Reporting and documentation:

We report annually on our human rights and environmental due diligence process and make our report publicly available on our corporate website. We report on the risks identified along the supply chain and in our own business area and describe the preventive and corrective measures implemented. The management of Jeans Fritz Handelsgesellschaft mbH is regularly informed about risk management by the Human Rights Officer. We aim to resolve every complaint together with those concerned and those responsible.

The fulfilment of due diligence obligations is continuously documented

Expectations and obligations:

The Jeans Fritz Code of Conduct for employees and suppliers sets out binding criteria for responsible behaviour in accordance with ethical and legal standards. All social and environmental standards defined in this Code of Conduct serve to protect all employees and prevent serious human rights violations.

We expect our suppliers and employees to respect and comply with all human and environmental rights as set out in our contractual/business agreements at all times. We also require our direct suppliers to comply with our human rights and environmental policies, to communicate them to their employees, to take action on identified risks, and to communicate and monitor compliance up the supply chain.