

HUGO BOSS

NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

1. PURPOSE

To provide a work environment in which all HUGO BOSS employees are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. As always, employees are expected to adhere to accepted standards of business conduct.

2. EFFECTIVE DATE

This policy was revised on April 2021.

3. SCOPE & APPLICABILITY

- 3.1. This policy applies to all HUGO BOSS USA applicants and employees, whether related to conduct engaged in by fellow employees or by someone not directly connected to HUGO BOSS (e.g., an outside vendor, consultant, applicant, customer). Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as business trips, business meetings, and business-related social events. In addition, actions will be taken against any employee who knowingly allows any conduct prohibited in this policy to occur.
- 3.2. Any retaliation against individuals who report, testify or assist in an investigation involving an act of misconduct is unlawful.

4. DEFINITIONS

- 4.1. Sexual Harassment: Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

The following is a non-exhaustive list of the types of conduct prohibited by this policy:

- Unwanted sexual advances or propositions (including repeated and unwelcome requests for dates);
- Offers of employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct: leering, making sexual gestures, displaying of pornographic or sexually suggestive images, objects, pictures, cartoons, graffiti, posters or websites on computers, emails, cell phones, bulletin boards, etc.;
- Verbal conduct: making or using sexist remarks or derogatory comments based on gender, innuendos, epithets, slurs, sexually explicit jokes, or lewd or sexual comments about an individual's appearance, body or dress, whistling or making suggestive or insulting sounds;
- Verbal and/or written abuse of a sexual nature, graphic verbal and/or written sexually degrading commentary about an individual's body or dress, sexually suggestive or obscene letters, notes, invitations, emails, text messages, or social media postings;
- Physical conduct: unwelcome or inappropriate touching of employees or customers, physical violence, intimidation, assault or impeding or blocking normal movements;
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity or expression, such as:
 - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
 - Sabotaging an individual's work; and
 - Bullying, yelling, name-calling

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Behavior may constitute sexual harassment regardless of the sex or gender of the person committing it or the person who is exposed to it. Sexual harassment can include harassment on the basis of an individual's actual or perceived sexual orientation, gender identity or gender expression.

Individuals who observe conduct that may violate this policy are encouraged, but not required, to communicate to the offending person that the conduct is offensive and unwelcome. Individuals who observe any behavior directed at others that may violate this policy are encouraged to take reasonable action to defuse such behavior if possible, such as intervening directly, alerting a supervisor or Human Resources to assist, or making a report under this policy.

- 4.2. Harassment: Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, sex, national origin, age, disability, or any other characteristic protected by law or that of his/her relatives, friends or associates, and that: (i) has the purpose or effect of creating an intimidating, hostile, or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities.
- 4.3. Employee: Any person directly employed by HUGO BOSS or any of its subsidiaries. Under no circumstances are independent contractors, contracted/temporary workers or interns considered employees, however, they are expected to comply with the guidelines set forth within this policy.

5. POLICY STATEMENT

It is the policy of HUGO BOSS to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), sexual orientation, gender expression or identity, age, disability, marital status, citizenship, genetic information or any other characteristic protected by law. Therefore, it is expected that relationships among employees in the workplace will be business-like and free of bias, prejudice, and harassment. HUGO BOSS prohibits any such discrimination or harassment and encourages reporting of all perceived incidents of discrimination or harassment.

6. TERMS AND CONDITIONS OF FLEXIBLE COMMUTE SCHEDULE POLICY

- 6.1. Option 1: HUGO BOSS encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Employees who believe they have been the victims of conduct prohibited by this policy statement or believe they have witnessed such conduct should discuss their concerns with their Manager and/or contact the Human Resources Department.
- 6.2. Option 2: Effective April 1, 2012, HUGO BOSS has engaged Lighthouse Services to provide an anonymous ethics and compliance hotline for all employees. The purpose of the service is to ensure that any employee wishing to submit a report anonymously can do so without the fear of retaliation. Employees are encouraged to use the hotline service in cases where their anonymity is desired. Employees should follow the company standard practices for all reports or issues not requiring anonymity.

Lighthouse Services toll free number and other methods of reporting are available 24 hours a day, 7 days a week for use by employees and staff.

- **Telephone:** (888) 783-1005
- **Website:** <http://www.lighthouse-services.com/hugoboss>
- **E-mail:** reports@lighthouse-services.com (Must include company name with report.)
- **Fax:** (215) 689-3885 (must include company name with report)

HUGO BOSS encourages the prompt reporting of complaints or concerns so that immediate action can be taken.

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- 6.3. Option 3: Effective October 1, 2018, HUGO BOSS has provided a Complaint Form to provide employees with an additional reporting method to report all perceived incidents of discrimination, harassment or retaliation. Employees are encouraged to use this form for documentation purposes. This form is readily available and located on the Employee Services Portal under My Personal Data Anti-Harassment and Anti-Discrimination Policy, as well as at the end of this policy.

7. HUGO BOSS INVESTIGATION PROCEDURE

Upon receiving a complaint about alleged discrimination or harassment, Human Resources will follow the HUGO BOSS anti-discrimination and anti-harassment prevention policy. During the investigation, HUGO BOSS ensures due process to all involved parties.

An investigation involves:

- Speaking with the employee
- Speaking with the alleged harasser
- Interviewing witnesses
- Collecting and reviewing any related documents

While the process may vary from case to case, all allegations will be investigated promptly and resolved as quickly as possible. The investigation will be kept confidential to the extent possible.

Human Resources will document the findings of the investigation and the basis for the decision along with any corrective actions taken. Human Resources will notify the complainant and the individual(s) against whom the complaint was made that the investigation has concluded, and the complainant may be informed of the resolution. HUGO BOSS expects all employees to fully cooperate with any investigation conducted by HUGO BOSS into a complaint of discrimination, harassment or retaliation.

All Managers who receive a complaint or information about suspected discrimination, harassment or retaliation, observe behavior that may violate this policy or for any other reason suspect that discrimination, harassment or retaliation is occurring, are required to report such information as set forth in this policy. In addition to being subject to discipline for engaging in discrimination, harassment or retaliation themselves, Managers will be subject to discipline (up to and including termination) for failing to report suspected discrimination, harassment or retaliation or otherwise knowingly allowing such conduct to continue.

If HUGO BOSS determines that this policy has been violated, including in the event that a Manager knowingly allows the policy to be violated without reporting it, prompt remedial action will be taken, commensurate with the severity of the offense, up to and including termination of employment. Appropriate action will also be taken to deter any such conduct in the future.

8. FEDERAL AND STATE PROVISIONS

Discrimination, harassment and retaliation are unlawful under the federal Civil Rights Act of 1964, the New York State Human Rights Law, the New York City Human Rights Law and other federal, state and local laws. Individuals who believe they have experienced discrimination or harassment may file a complaint with an administrative agency or in a court of law.

The Equal Employment Opportunity Commission has district, area and regional offices and may be contacted by visiting www.eeoc.gov, emailing info@eeoc.gov or by telephone at 800-669-4000 (TTY 800-669-6820). The New York State Division of Human Rights may be contacted by visiting www.dhr.ny.gov, by telephone at 718-741-8400, or by mail to One Fordham Plaza, Fourth Floor, Bronx, New York 10458. The New York City Commission on Human Rights may be contacted by visiting NYC.gov/HumanRights or by telephone at 718-722-7131. Employees who are subjected to unlawful discrimination, harassment or retaliation may be entitled to certain legal remedies, including monetary damages, civil penalties, and injunctive relief (such as an order that certain action be taken or that certain behavior stop). Additional information, including the physical location of agency offices and the rules, requirements and time limits for filing complaints, can also be found at the respective agency websites. Information regarding federal, state and city courts is available online.

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9. POLICY OWNERSHIP

This policy is owned by HUGO BOSS Human Resources Department.

10. POLICY CHANGES AND INTERPRETATIONS

This policy may only be changed by Human Resources. Questions regarding interpretation and clarification should be directed to your Manager.

11. POLICY ENFORCEMENT

HUGO BOSS has developed this policy to ensure that all employees can work in an environment free from unlawful harassment, discrimination and retaliation. HUGO BOSS will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint in violation of this policy will be investigated and resolved appropriately.

The information contained in this document supersedes and replaces all previous statements of company policies, rules, handbooks, and procedures. Some states have special guidance, in which case, the State regulations will prevail to the extent required.

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COMPLAINT FORM

If you believe that you have been subjected to or have witnessed discrimination or harassment, you are encouraged to complete this form and submit it to Human Resources. You will not be retaliated against for filing a complaint.

COMPLAINANT INFORMATION

Name:

Work Address:

Work Phone:

Job Title:

Email:

Select Preferred Communication Method: Email Phone In person

SUPERVISORY INFORMATION

Immediate Supervisor's Name:

Title:

Work Phone:

Work Address:

COMPLAINT INFORMATION

1. Your complaint is made about:

Name:

Title:

Work Address:

Work Phone:

Relationship to you: Supervisor Subordinate Co-Worker Other

2. Please describe your complaint. Please use additional sheets of paper if necessary, and please list or attach any documents or other material that may relate to your complaint, such as emails, text messages, letters, notes, memos, diary entries, calendars, reports or other items. If your complaint involves specific comments, please include a description of the comments.

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3. Please list the name and contact information of any individuals who may have information related to your complaint:

4. Have you previously complained or provided information (verbal or written) to anyone at the Company about your concerns or about any related incidents? If yes, when and to whom did you complain or provide information?

I understand that if I become aware of additional information that relates to my complaint, I must promptly provide such information to the Company. I also am aware that the Company prohibits retaliation against me for filing this complaint, and I agree that I will immediately report any incident I believe is retaliatory using the Company's procedures for reporting retaliation.

Signature: _____

Date: _____

HR Signature: _____

Date Received: _____