

COMPLIANCE

HUGO BOSS

WHISTLEBLOWING POLICY

(Includes the rules of procedure according to the Supply Chain Due Diligence Act (LkSG))

AT A GLANCE

This Chapter is intended to quickly acquaint all of HUGO BOSS's employees with the core elements and provisions of the **HUGO BOSS WHISTLEBLOWING POLICY**:

- I. **HUGO BOSS will protect all whistleblowers from retaliation or detriment if they report a concern in good faith.** It will never tolerate reprisals such as disciplinary letters, suspensions, dismissals, negative performance evaluations etc. in respect of persons who report wrongdoing.
- II. **Protected whistleblowers may include:** job applicants, employees, former employees, business partners, direct and indirect suppliers and their employees, customers as well as other third parties.
- III. HUGO BOSS will provide an external and an internal whistleblowing system for reports.
 - **External HUGO BOSS whistleblowing system:**
Ombudsman - Dr. Carsten Thiel von Herff - <https://report-tvh.de/>
 - **Internal HUGO BOSS whistleblowing system:**
Compliance Department - [HUGO BOSS Whistleblowing Portal](#)

Reports may also be made in person, by phone, by e-mail or by mail.
- IV. The **identity of any whistleblower** who reports a concern will be kept confidential and will only be known to authorized persons.
- V. **Reports may be submitted anonymously** at any time via the HUGO BOSS Ombudsman or the web-based internal HUGO BOSS whistleblowing system.
- VI. **In particular, whistleblowers may report criminal and administrative offenses, violations in a wide range of areas** (data protection, competition law, product safety, environmental protection, etc.), **human rights violations, including those occurring along the supply chain, as well as violations of internal guidelines and codes of conduct. A whistleblower will be justified in making a report if he or she has probable cause for suspecting a violation.**
- VII. The HUGO BOSS Compliance Department will acknowledge receipt of each report without delay, but no later than within 7 days, and will then process the report. All whistleblowers will receive feedback, at the latest, within three months from the acknowledgment of receipt of the report.

Please note that it is not possible to provide detailed rules, practical examples, instructions on how to behave or a complete overview of the Policy in this AT A GLANCE chapter. This will follow in the sections below.

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INTRODUCTION

1 PURPOSE

HUGO BOSS abides by the law and maintains the highest standards of conduct and integrity. We take every disclosure of non-compliance with laws or internal rules and regulations (e.g. policies) seriously and are always interested in investigating and remedying such compliance violations. For this reason, we give all of our employees, suppliers and third parties the opportunity to draw attention to irregularities within their own area of activity or to non-compliance on the part of our Company with the law ("whistleblowing").

Disclosures are important.
They reveal irregularities!

HUGO BOSS is aware that whistleblowers may fear adverse consequences if they make a report. This Policy thus grants all whistleblowers far-reaching protection against disadvantages.

In addition, it is designed to describe our internal processes in a transparent manner so that all potential whistleblowers have access to as much information as possible about the procedure.¹

2 SCOPE OF APPLICATION

This Policy applies to employees of all HUGO BOSS companies and all of the Group's divisions. Compliance with the standards set forth below is mandatory for all employees.

If this Policy conflicts with country-specific laws, individual provisions of it may be modified. However, the essence and spirit of the respective provision must be respected. Where exceptions are necessary, reasons must be provided. Furthermore, such exceptions must be agreed in advance with the Group's Compliance Officer.

No violation of this Policy will be tolerated and any such violation may lead to disciplinary action under employment law.

RULES

3 WHO CAN BE A WHISTLEBLOWER?

Anyone can be a whistleblower!

A whistleblower can be any internal or external person.

This includes, in particular, the following persons: job applicants, employees, former employees, business partners, direct and indirect suppliers and their employees, customers and other third parties.

¹ In this guideline, HUGO BOSS also implements the requirements for the rules of procedure in accordance with the German Supply Chain Due Diligence Act (LkSG), see Section 8 (2) LkSG.

4 WHAT SHOULD BE REPORTED?

Every whistleblower is entitled to report any unlawful act or omission on the part of the Company as well as any unlawful act or omission occurring within its area of activity if such act or omission is punishable by a criminal penalty or an administrative fine. Furthermore, disclosures of human rights abuses or environmental risks or violations may always be made ("violations" or "breaches").

In addition, the following violations may be reported:

- Criminal offenses
- Administrative offenses
- Violations and abuses of human rights and environmental laws
- Breaches of privacy and data protection
- Security breaches of network and information systems
- Violations of product safety law
- Violations of consumer protection law
- Breaches of competition law
- Breaches of antitrust law
- Violations of animal health and welfare regulations
- Violations of the HUGO BOSS Code of Conduct and internal rules and regulations

The whistleblower does not have to be able to prove the violation or breach at the time of the report. The fact that there could have been a breach is enough to justify making a report. The whistleblower should always make a report if he or she believes in good faith at the time of the report that the information that he or she discloses is correct. This will not be the case if the whistleblower knows that the information reported is untrue. If the whistleblower is in doubt, he or she may still make a report, but the disclosures should then not be presented as facts, but rather as suspicions, evaluations or as statements by other persons.

5 HOW CAN A DISCLOSURE BE MADE? – STRUCTURE OF THE WHISTLEBLOWING SYSTEM

HUGO BOSS offers all potential whistleblowers both an internal as well as an external whistleblowing system. The two whistleblowing systems are comparable, i.e. all disclosures will be treated in the same way regardless of which system was used for making them. Both whistleblower systems ensure confidentiality, can be used free of charge and are accessible worldwide.

5.1 Confidentiality & Anonymity

Any report - irrespective of its veracity - is likely to cause serious damage to the reputation of the person concerned, the person providing the information or third parties, and the Company. **Accordingly, each report must be treated with the utmost confidentiality and in compliance with applicable laws. Both the external and the internal whistleblowing systems at HUGO BOSS are such that they always ensure that not just the identity of the whistleblower(s), but also that of third parties who are the subject of a report or who are mentioned**

The identity of the whistleblower(s) will always be kept confidential!

in it are kept confidential. Unless the whistleblower expressly consents, this information will not be disclosed to anyone other than the authorized staff who are responsible for accepting reports or following up on them. This also applies to all other information from which the identity of the whistleblower(s) could be ascertained either directly or indirectly. No unauthorized persons will be permitted access to this information.

In certain cases prescribed by law, HUGO BOSS is obliged or entitled to reveal the identity of the whistleblower(s) or other confidential information (see on this [9. Data Protection](#)).

HUGO BOSS provides two whistleblowing systems.

HUGO BOSS permits all whistleblowers to make a report without revealing their own identity ("anonymous reporting"). **Anonymous reports should always be submitted via the external whistleblowing system ([5.2 External HUGO BOSS Whistleblowing System](#)) or via the web-based internal whistleblowing system ([5.3 Internal HUGO BOSS Whistleblowing System](#)).**

5.2 External HUGO BOSS Whistleblowing System

Utilizing the HUGO BOSS Ombudsman as a reporting channel, HUGO BOSS has set up an external whistleblowing system that is available to all potential whistleblowers. This ombudsman is an external "trusted lawyer", who has been appointed to fill this role for all of the Group companies. This allows disclosures to be made in person, by telephone, by mail or by e-mail at any time (24/7).

All whistleblowers are free to make their disclosures in their own native language or in any other language. If disclosures are made in person or by telephone, an interpreter will, if necessary, be hired.

The ombudsman will treat all disclosures confidentially. In addition, the ombudsman will inform each whistleblower that it is possible to make an anonymous disclosure.

The contact details of the HUGO BOSS Ombudsman are as follows:

Dr. Carsten Thiel von Herff

Loebellstraße 4

33602 Bielefeld

Germany

Phone 1: 00800 OMBUDSMAN (00800 6628376266) (free call number)

Phone 2: + 49 521 55 7 333 0

Mobile: + 49 151 58 230 321

E-mail: ombudsman@thielvonherff.com

Electronic system: <https://report-tvh.de/>

5.3 Internal HUGO BOSS Whistleblowing System

In addition, the HUGO BOSS Compliance Department offers a web-based internal whistleblowing system that can be accessed from various end devices. Whistleblowing reports can be filed anonymously. They will always be handled confidentially and processed in accordance with the law.



This is the link to the internal HUGO BOSS whistleblowing system:

HUGO BOSS Whistleblowing Portal

If you would prefer to submit your report in person, the Compliance Department is always there for you. The Compliance Department also accepts telephone, postal or e-mail reports.

The contact details of HUGO BOSS's Compliance Department are:

Dominik Heske	Charlotte Blessin
Group Compliance Officer	Compliance Manager
Phone: + 49 7123 94 83859	Phone: + 49 7123 94 86808
Mobile: + 49 160 97 805613	
E-mail: dominik_heske@hugoboss.com	E-mail: compliance@hugoboss.com
E-mail: compliance@hugoboss.com	

Non-web-based reports to the Compliance Department will be treated with just as much confidentiality as those made using the web. However, reports can only be made anonymously via the web-based internal or external HUGO BOSS whistleblowing systems.

5.4 External Whistleblowing Systems of Government Agencies

By providing its whistleblowing systems, HUGO BOSS has created a protected platform for reporting concerns. In addition, government agencies in the European Union offer external whistleblowing systems. You can find information on this in HUGO BOSS's intranet.

6 HANDLING OF REPORTS / SUPPLY CHAIN ACT - RULES OF PROCEDURE

6.1 Responsibility

The Compliance Officer, who is independent and not bound by instructions when performing his duties, is the person responsible for establishing, managing and regularly reviewing the effectiveness of the whistleblowing system. The Compliance Officer is also responsible for investigating reports and involving the departments concerned. This will be done in accordance with the predefined handling procedures outlined below.

6.2 Acknowledgment of the Whistleblower's Report & Contact

HUGO BOSS will acknowledge receipt of the report without delay, but no later than within 7 days. If possible and promising, the Compliance Department will discuss the matter with the person making the report. The acknowledgment and discussion will come either directly from the Compliance Department or the HUGO BOSS Ombudsman. Reports made anonymously will only be acknowledged to the extent it is possible to do so.

6.3 Report Management

The Compliance Department will enter all reports, regardless of the reporting channel used to make them, in a central system that keeps the identity of the whistleblower confidential and protected from unauthorized access. The Compliance Department will then conduct a legal analysis of the reports. It will prepare a record of any verbal disclosures. Upon request, the whistleblower will be given the opportunity to review the record of the conversation, correct it if necessary, and confirm the accuracy of the record by signing it.

6.4 Preliminary Review

The Compliance Department will conduct a preliminary review of every report received.

If the preliminary review finds no indications of a violation pursuant to section 4 of this Policy or if the Compliance Department assesses the report as unjustified, no further action will be taken. The results of the review will be documented and the whistleblower will be notified of the results without delay.

If the preliminary review shows that a relevant violation may have occurred, this must be recorded, and the principle of proportionality (appropriateness of intervention and purpose) must always be applied to any follow-up measures. This explains why it is not uncommon to only pursue allegations of criminal or serious misconduct.

6.5 Managing Board Information

The Compliance Officer informs the responsible board member immediately about reports from whistleblowers if these are of significant importance for the company.

This is particularly the case when

- the report has or could have a material impact on the company's reputation.
- the report contains allegations against the Executive Board or the management of HUGO BOSS AG or the subsidiaries.
- The report includes damage of more than EUR 10,000 (corresponding to other currencies) or this is to be expected.

In these cases, the further course of action is discussed in coordination with the responsible board member.

6.6 Investigations

The Compliance Department will then initiate the necessary investigations, which will in each case be concluded with a closing report. The Compliance Officer or the Compliance Department maintains contact with the whistleblower throughout the investigation. Every whistleblower will receive feedback at the latest within three months from the acknowledgment of receipt of the report that he or she submitted. If investigations take longer due to special circumstances, the Compliance Department will inform the whistleblower of their expected duration.

In general, the presumption of innocence applies, which is why not only incriminating but also exculpatory evidence is sought.

6.7 Conclusion

If the Compliance Department finds in its investigations that a punishable violation occurred, it will, irrespective of the identity of the person who committed the violation or their level in the Company hierarchy, make recommendations for action to the Managing Board member responsible for the department concerned. The final decision on the action to be taken will be made by such member.

Violations will be punished regardless of the person who committed them or that person's level in the Company hierarchy!

All documents will always be checked for accuracy and completeness.

6.8 Special Case - Misconduct on the Part of the Compliance Department

If you wish to report potential misconduct by the Compliance Department, you are advised to make your report to the external HUGO BOSS Ombudsman. The Ombudsman will report the potential violation directly to the Managing Board member responsible for the department. The Managing Board will take the measures necessary to investigate the report.

7 WHISTLEBLOWER PROTECTION

7.1 General

HUGO BOSS will grant all whistleblowers protection within its own area of activity. A central component of whistleblower protection is the confidential treatment of the identity of the whistleblower(s) (see [5.1 Confidentiality & Anonymity](#)). If the whistleblower provides his or her contact details, these will be processed in compliance with data protection regulations.

The name or other information that directly or indirectly allows the whistleblower to be identified will not, as a rule, be revealed. The situation may be different if the whistleblower expressly gives permission for the revealing of his or her identity, if there is a legal obligation to do so, or if the identity of the whistleblower becomes unavoidably known in some other way (e.g. in the case of employees of indirect suppliers over whom HUGO BOSS has no direct influence). This also applies in particular where, in order to enable the person affected by the report to exercise his or her right to be heard or to defend himself or herself, the whistleblower's identity must be revealed. In such cases, the whistleblower will be informed in advance if his or her identity will be revealed provided that doing so does not jeopardize any relevant investigations or legal proceedings.

7.2 Protection from Reprisals

If a whistleblower acted in good faith, no form of retaliation or discrimination ("reprisals") against the whistleblower for reporting suspected wrongdoing is permissible. This also applies to any threat or attempt to carry out reprisals. HUGO BOSS will not tolerate any infringements of these provisions and such infringements may be for their part be reported in accordance with the requirements of this Policy.

HUGO BOSS will not tolerate reprisals of any kind against a whistleblower because he or she made a particular report. This includes, in particular, protection against:

- Suspension, dismissal or comparable measures
- Transfer of duties, change of work location, reduction in salary, change in working hours
- Negative performance appraisal or issuance of a poor job reference
- Disciplinary action, reprimands or other penalties, including financial penalties
- Coercion, intimidation, bullying or ostracism
- Discrimination, adverse or unequal treatment
- Harm (including reputational harm), particularly on social media, or causing financial loss (including loss of business or revenue)
- Early termination or cancellation of a contract for goods or services
- Withdrawal of a license or permit

The whistleblower protection is available even if the allegation cannot be substantiated.

However, any abuse of the protection afforded to whistleblowers will not be tolerated.

Whistleblower protection will not be extended to measures which had already been taken or were clearly planned to be taken before the whistleblower made his or her report or that are based on a different set of circumstances. Similarly, disclosures whose sole purpose is to inflict harm will not be covered. Such disclosures will not enjoy whistleblower protection and will, in clearly provable cases, be punished.

8 PROTECTION OF THE PERSON AFFECTED BY A REPORT

Any person affected by a report will be notified of the allegations against him or her at the appropriate time, taking into account the requirements of data protection law. This will occur unless such notification would significantly impede the progress of the proceedings to establish the facts or the implementation of follow-up measures. The notification will be made, at the latest, after the investigation has been completed or at such time as when the investigation could no longer be jeopardized by doing so.

If a suspicion raised by a report is dispelled, the person affected may request that HUGO BOSS delete any data that it has stored in this context.

9 DATA PROTECTION

Personal data will be collected and stored in the course of implementing procedures under this Policy. The applicable data protection provisions will be complied with at all times when handling personal data. Only those personal data that are needed for carrying out the purposes specified in this Policy will be processed.

Any persons involved in the procedure, including the whistleblowers themselves, may contact the HUGO BOSS Data Protection Officer at any time (DPO@hugoboss.com) in order to verify that the rights afforded by the relevant provisions have been observed.

HUGO BOSS will comply with the applicable time limits that apply to data retention and erasure of data prescribed by law.

All persons whose personal data HUGO BOSS processes in connection with a procedure under this Policy may - if the relevant legal requirements are met - exercise their right to request that any data that are inaccurate be rectified, that their data be blocked or erased, or that HUGO BOSS provide them with information on the personal data that it has about them. Furthermore, such persons may also exercise their right to data portability at any time or may lodge a complaint with a supervisory authority about any processing of their personal data that does not comply with data protection law.

Where such objection is based on a legitimate interest, a data subject will also have the right to object at any time to processing of personal data concerning him or her on grounds relating to his or her particular situation (objection to processing).

10 VERIFICATION OF EFFECTIVENESS

The compliance department at HUGO BOSS reviews the effectiveness of the complaints procedure at least once a year or as required.

11 APPLICABILITY & UPDATING

This Policy takes effect on 1 January 2022 and applies without restriction throughout the entire HUGO BOSS Group (see [2. Scope of Application](#)).

This Policy may be amended at any time. The guideline is checked at least once a year to ensure it is up to date. Experiences from the past year and suggestions from internal and external stakeholders are always considered. The most recent version of the Policy will always be available on the Company's website or on HUGO BOSS's intranet.

12 POINT OF CONTACT

Infringements may be reported at any time (also anonymously) to the HUGO BOSS Ombudsman, [Dr. Carsten Thiel von Herff](#) or to [HUGO BOSS Whistleblowing Portal](#).

If you have any questions or suggestions, please contact your own superior, the HUGO BOSS Ombudsman or either your local or the central [Compliance Department](#).

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