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## **Code of Conduct for the Employees**

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As of: 01/2023

For reasons of better readability, we do not use the simultaneous use of the language forms male, female and diverse (m/f/d). All references to persons apply equally to all genders.

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## 1. Our code of conduct



long-term economic success.

Our code of conduct comprises the essential fundamental principles and rules for our actions. The code constitutes the demands we place on ourselves, which all the employees must fulfil in their day-to-day actions in life.

The code of conduct is a guideline for all the employees of Takko Fashion in all the countries. It describes the fundamental principles and values by which we abide in our daily dealings with each other, with customers, and with business partners.

## 2. Our vision and mission

We are Takko Fashion – the quality discount shop. We love to delight our customers with fashion and quality. That is our mis-

<sup>1</sup> Takko Fashion GmbH as well as all the affiliated companies within the meaning of §§ 15 ff. of AktG [German Stock Corporation Act]

As a globally operating company<sup>1</sup> we have the obligation and the self-perception to act responsibly and lawfully. We take this responsibility as a company and a part of the society as well as the environment and thus secure our

sion that drives us every day. Our vision is to dress up the world - with respect for people and planet.

That means: With our business model, we offer our customers trendy and high-quality clothing.

At the same time, we take social and ecological responsibility. That is our contribution towards the society.



## 3. Our cooperation – a Takko team

Our employees and colleagues are the core of our company. Together, we achieve our goals, celebrate our successes, and learn from our mistakes. Seven values define our team spirit at Takko Fashion:

- ✦ A **customer centric approach** drives us Our customer is at the focus in all our decisions.
- ✦ We have the **courage** to bring about change and recognise our mistakes as a chance to learn.
- ✦ We direct our **focus** on the essential things, keep processes sleek and our actions also save resources.
- ✦ We live **openness** by sharing knowledge and experiences with each other and are open-minded about new things.
- ✦ Our **trusting** cooperation is reflected in our open and honest communication as well as mutual support.
- ✦ We show **respect** in the form of equal opportunity and equal rights, in the measures to protect the employees as well as respectful handling of resources.
- ✦ Together, we achieve more. Our values make us **a team**.

#### 4. Compliance as a responsibility

Each employee is personally responsible for compliance with the laws in his area of responsibility and contributes significantly to the reputation of Takko Fashion in his/her demeanour, actions, and conduct. Our senior executives have a special exemplary function and their actions can be measured particularly by this code of conduct.

They are the first contact persons in case of questions on understanding the regulations and make sure that all the Employees know and understand the code of conduct. As a part of their management function, they prevent unacceptable conduct and take appropriate measures to prevent violation of rules in their area of responsibility.



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Observance of our Takko Fashion values provides for a positive and trusting cooperation and supports compliance conforming conduct.

#### 5. Compliance with the statutes

We comply with the laws of the respective countries in which we do business. This is a fundamental principle of economically responsible actions for us, independent of the economic disadvantages caused by it. We also expect the same from our business partners.

Trusting and good cooperation between the employees and senior executives is reflected in open and honest information, communication, and mutual support.

## 6. Avoidance of conflicts of interest

There is always a conflict of interest when private interests can influence official decisions.

In order to avoid these at the outset, each employee must separate their private and business interests and make decisions impartially and in the spirit of Takko Fashion.

## 7. Prevention of money laundering

Takko Fashion meets its statutory obligations to prevent money laundering and does not participate in money laundering activities. Each employee is encouraged to report unusual financial transactions, especially including cash, which can establish a suspicion of money laundering to the contact partners named in clause 19.



## 8. Gifts and invitations

The acceptance or grant of gifts may be done only under the prerequisites of the Takko anti-corruption guidelines. The acceptance of cash or equivalents of cash (e.g.; gift vouchers, securities) is prohibited. Invitations to meals may be accepted only within the limits of the normal business hospitality and must meet the prerequisites of Takko anti-corruption guidelines.

## 9. Prohibition on bribery and corruption



Takko Fashion follows a zero tolerance policy in matters of bribery. Any relationship Takko Fashion to public officials, business partners, and private persons must be transparent in order to prevent any semblance of corruption.

Our business partners are not offered, promised, or granted any perks.

We maintain a special reserve when it comes to public officials. The term 'public officials' should be interpreted broadly and includes officials, employees of public authorities, public bodies, government enterprises, international organisations, as well as

delegates, candidates, representatives, and employees of political parties.

### 10. Donations

We consider ourselves as an active member of the society and get involved in it in different ways. We perform donations and other forms of social endeavours solely in the interest of a good cause.

Conversely, Takko Fashion does not make any financial contributions, especially no donation and sponsoring activities, to political parties in the country or abroad, party affiliated or similar organisations, individual elected officials, or candidates for political offices.

### 11. Fair competition

We are committed to fair competition as a prerequisite to the social market economy and adhere to the laws required for the protection of the competition. Our employees are obligated to abide by the rules of fair competition.



We reject dishonest behaviour such as illegal price agreements and market sharing with competitors or sup-

pliers, offences as well as illegal methods of procuring information through employees.

### 12. Employee welfare and human rights

We bear social responsibility towards all our employees and always treat them and our suppliers, customers, and all other person with fairness and respect.



We respect the standards of the International Labour Organisation (ILO) and actively stand up for respecting human rights and the respective applicable laws. We reject any form of forced and child labour.

### 13. Employee protection

Our greatest asset is the health and safety of our employees. Therefore, we create safe working conditions and integrate occupational health and safety in our business processes.

Likewise, it is up to all the employees to unconditionally comply with our safety regulations and to immediately point out any grievances or remedy those in their area of responsibility. Each

senior executive is obligated to support their employees in fulfilling this responsibility.

#### 14. Equality of treatment

Discriminations based on ethnic origin, gender, religion, worldview, a disability, age, or sexual identity are prohibited.

This is especially true when dealing with employees, especially at the time of their recruitment, promotion, or release from work, but also while dealing with business partner



#### 15. Fair working conditions

We abide by the respective statutory regulations on working hours, remuneration, and other benefits. We also encourage our business partners to abide by these regula-

tions.

#### 16. Environment and sustainability

We have rooted the protection of our environment as well as the sustainable production of our goods in our corporate objec-

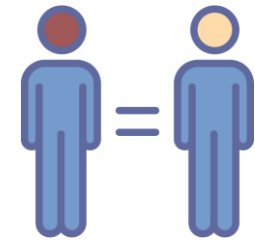


tives. We are economical with all natural resources, especially during development and design, production process, packaging, and during dispatch of our goods as well as in refining the procedures. We avoid or reduce stresses for people as well as nature in the entire value addition chain.

#### 17. Data protection



The protection of personal data, especially data of our employees, customers, and suppliers is particularly important for Takko Fashion. Without the consent of the data subject or a statutory basis, Takko Fashion does not collect or process any personal data.



We support the security of the data and processing operations through relevant technical and organisational measures. Each employee must follow the data protection rules relevant for his area of work with the necessary diligence.



#### 18. Implementation

We expect our employees to comply with this code of conduct. Irrespective of their hierarchical position, all



the employees are personally responsible for compliance with the code of conduct. The senior executives have an especially important role due to their exemplary function.

## **19. Reports of violations**

In order to guarantee a compliance with this code of conduct, we take questions about the code of conduct as well as indications of possible violations extremely seriously. All reports can be made anonymously. We treat each report strictly confidentially. We are reachable as follows:

**By letter:** Takko Fashion GmbH, Compliance Officer,  
Alfred-Krupp-Str. 21, 48291 Telgte

**By email:** [compliance@takko.de](mailto:compliance@takko.de)