Simplicity_

Code of Conduct

As a company, we have a responsibility towards our employees, stakeholders, society and the environment. This Code of Conduct sets out the principles that guide the way we conduct our business.

Simplicity_

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Preamble

The Code of Conduct sets out the principles that guide us as employees of Simplicity. It provides guidance for our day-to-day conduct in an increasingly globalised and interconnected world.

The Code of Conduct for Simplicity and its fashion brands OPUS and someday was drafted with reference to the Code of Conduct of the German textile and fashion industry.

As the management, we confirm with our signature that we will implement and comply with this Code of Conduct.

Date	Stefan Leewe	Tim Schürmann	Kristina Meyer
09/25/2026			

1 Basic understanding and validity

We see ourselves as part of the societies in which we operate. We therefore take the direct and indirect impacts of our business activities on society and the environment into account when making decisions. In doing so, we seek to strike an appropriate balance between business objectives and social and environmental considerations.

Our conduct is guided by generally recognised values and principles, in particular integrity and legality. We comply with applicable laws and respect internationally recognised human rights and labour standards, as set out in this Code of Conduct. We apply the principles of this Code at all our company locations in Germany and abroad. Within the limits of our respective legal and practical capabilities, we make every appropriate and reasonable effort to ensure their continued implementation.

If existing national regulations contradict the provisions of this Code of Conduct or if the national context makes it impossible to comply with them in full, we will still strive to find a way to meet the requirements of the Code of Conduct to the fullest extent possible.

2 Human rights and labour standards

We respect human dignity and uphold internationally recognised human rights, as set out in particular in the United Nations (UN)[1] Universal Declaration of Human Rights and addressed in the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.[3] We also take into account the internationally recognised labour standards of the International Labour Organisation (ILO), as listed below in the Code of Conduct.

In all our business activities we always strive to neither cause nor contribute to human rights violations. We expect the same from our business partners. As far as necessary and possible, we support our supply partners in this.

Furthermore, we commit to comply with all applicable laws, in particular those laws that must be displayed in Germany. The current legal regulations can be viewed via the following link.

2.1 Employment relationships

We appreciate our employees. We reject any form of unlawful punishment, abuse, harassment, intimidation, mobbing or other undignified treatment towards workers. This includes the prohibited use of physical or psychological disciplinary measures.

We abide by the applicable labour law in all employment relationships and expect the same from our contractual partners. At the beginning of the employment relationship workers shall be provided with comprehensible information about the essential terms and conditions of employment, including their rights and duties, as well as the working hours, remuneration and payment arrangements and modalities.

We respect and protect the right of employees to terminate their employment in accordance with the applicable notice period.

2.2 Prohibition of child labour and protection of young workers[4]

We do not tolerate child labour and observe the applicable legal minimum age for admission to employment. We do not employ persons under the age at which compulsory education ends under the law of the place of employment and under the age of 15.

We expect our contractors to have adequate means of determining age to prevent child labour. If the use of child labour is identified, all necessary measures are immediately initiated focusing on the best interests, protection and development of the child.

1 Universal Declaration of Human Rights
2 UN Guiding Principles on Business and Human Rights
3 OECD Guidelines for Multinational Enterprises
4 ILO Conventions 138 and 182

For people under the age of 18, the rights of young workers shall be observed; they may only be hired if it is ensured that the working and employment conditions do not pose a risk to their health, safety or morals, nor are they harmful to their development.

2.3 Prohibition of forced labour[5]

We reject all forms of forced or compulsory labour, including any form of bonded labour, serfdom, slavery or slave-like practices, trafficking in human beings or any other involuntary labour and services that are not in conformity with internationally recognised labour and social standards.

2.4 Remuneration[6]

We adhere to the statutory or – where applicable – collective agreement provisions for the remuneration of work performance. We ensure that the wages we pay are not below the wage that is legally applicable, determined by employers' associations or trade unions, or the industry-specific minimum wage. We further ensure that wages are only paid within the framework of a legally valid employment contract. In countries or regions without a statutory or collective wage framework, we pay particular attention to the fact that the wages paid are sufficient for regular full-time work in order to meet the basic needs of the employees.

We do not tolerate deductions from wages that are not permitted by law, including deductions from wages as a disciplinary measure. We do not request or require our employees to make capital contributions or financial guarantees, nor do we withhold identification documents.

2.5 Working hours[7]

We adhere to the statutory or applicable collective agreement provisions on working time, including overtime, rest breaks and annual leave. In any event, we make sure that

- the regular weekly working time does not exceed 40 hours plus a maximum of 10 hours overtime per week,
- that the right to rest breaks is respected on each working day,
- that six consecutive working days are regularly followed by a day off
- and that public or religious holidays and holiday leave are respected.

Overtime shall be compensated or remunerated at least in accordance with statutory or collectively agreed regulations; it shall be ordered exceptionally and exclusively on a statutory, collectively agreed or contractual basis.

5 ILO Conventions 29 and 105
6 ILO Conventions 26 and 131
7 ILO Convention 1; ILO Recommendation 110
8 ILO Conventions 11, 87, 98, 135 and 141

2.6 Freedom of association[8]

We respect the right of workers to freedom of association, freedom of assembly and the right to collective bargaining and wage negotiations, insofar as this is legally permissible and possible in the respective country of employment. If this is not permissible, we seek appropriate compromises for our employees.

2.7 Diversity and inclusion, ban on discrimination[9]

We promote a work environment that enables inclusion and where the diversity of our employees is valued. We are committed to equal opportunities and reject any form of discrimination or unjustified unequal treatment in employment, for example on the basis of national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief.

We also take into account the principle of equal pay for workers of all genders for work of equal value.

2.8 Health and safety at work1[10]

We adhere to national and international occupational health and safety standards and ensure a safe and healthy working environment in order to maintain the safety and health of our employees, protect third parties and prevent accidents, injuries and work-related illnesses. This shall include regular risk assessments of the workplace and the implementation of appropriate security and precautions, including the provision of appropriate personal protective equipment.

We ensure that our employees are trained in all relevant occupational health and safety topics.

9 ILO Convention 100, 111 and 159; ILO Recommendation 165
10 ILO Convention 155, 183 and 184; ILO Recommendation 164

3 Environmental responsibility

The protection and preservation of natural resources concerns and obligates us all. With this in mind, we conduct our business activities taking into account the ecological aspects and are committed to the goal of a climate-neutral future.

3.1 Protection of the environment and climate

We assume our environmental responsibility by complying with applicable legal requirements and recognised standards for the protection of the environment and climate, and by making efforts to continuously improve the impact of our business activities on the environment and climate.

We have taken appropriate measures, which are based on legal and internationally recognised standards, and cover the following topics, among others:

- Professional and responsible handling of hazardous substances and other chemicals as well as waste, including disposal;
- Efforts to reduce or prevent waste and the minimisation of emissions from operation (e.g. waste water, waste air, noise, greenhouse gases);
- Conservation of natural resources, for example through measures to save water, chemicals and other raw materials;
- Promoting the use of recycling and other climate and environmental technologies, processes raw materials and products;
- Efforts to increase the energy efficiency and the proportion of green or renewable energies in energy consumption at our company locations.

3.2 Animal and species protection

We respect the principles of animal welfare and biodiversity and align our corporate actions accordingly. The keeping and use of animals must comply with the applicable legal animal welfare requirements and be appropriate to the species. The Washington Convention on International Trade in Endangered Species of Wild Fauna and Flora[11] shall be complied with.

11 Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

4 Ethical business practices and integrity

We pursue only legitimate business objectives and practices. We build and maintain business relationships only with reputable partners.

We behave in a fair and appreciative manner towards our business partners and customers. We respect the different legal, economic, social and cultural backgrounds and circumstances of the countries and regions in which we operate. We always base our entrepreneurial actions on universally valid ethical values and principles, including integrity and respect for human dignity.

We support free and fair world trade and abide by the laws and regulations of the countries and regions in which we do business.

4.1 Corruption[12], trade control, money laundering

We reject all forms of bribery and corruption and already avoid any appearance thereof – be it in the form of granting or accepting unfair advantages.

We act in accordance with the applicable import and export control regulations and comply with legal requirements for the prevention of money laundering.

4.2 Fair competition

We support free and fair competition. We do not tolerate any anti-competitive agreements and ensure that we act in accordance with the applicable antitrust laws. We reject competitive advantages due to unfair business practices.

4.3 Personal data, protection of confidential information and intellectual property

We respect the privacy rights of our employees, business partners and customers and adhere to the applicable data protection and security requirements and regulations when handling personal information.

We take great care to ensure that commercial secrets and other confidential information that our business partners and customers entrust to us are adequately protected from unauthorised acquisition, use and disclosure, at least in accordance with the relevant legal provisions for the protection of business secrets.

We respect the intellectual property of our business partners, customers and other third parties. We ensure that sufficient precautions are taken to protect intellectual property rights when transferring expertise and technologies.

12 United Nations Convention against Corruption

4.4 Consumer interests

Where our products and services concern the interests of consumers, we have taken appropriate measures to ensure the safety and quality of the products or services we offer. We ensure that our products or services comply with the relevant statutory consumer protection regulations.

As part of our information and distribution activities, we take consumer interests into account by applying fair business, marketing and advertising practices and promoting consumer education. We pay particular attention to the interests of children, senior citizens, people with disabilities and other vulnerable consumer groups.

5 Implementation

We make appropriate and reasonable efforts to comply with the contents of the Code of Conduct on an ongoing basis at all our company's locations. We have set up suitable measures and processes for this purpose and document their implementation within the company in an appropriate manner. The executive management is kept informed at regular intervals about the implementation and work of the responsible bodies and persons.

5.1 Communication and training

We communicate the contents of the Code of Conduct to our employees, business partners and other key stakeholders and train our employees on relevant topics as required. We expect our employees to comply with the Code of Conduct.

5.2 Expectations of our supply chains, control measures

The Code of Conduct also reflect our expectations of our supply partners and other contractual partners in our supply chains. In this respect, we expect them to comply with the contents of the Code of Conduct or to apply a comparable code of conduct. We encourage our business partners to demand this expectation from the contractual partners in their supply chain.

We value long-term business relationships based on partnership. We therefore identify and verify our contractual partners in an appropriate manner before entering into a supply relationship, e.g. through self-disclosure, supplier evaluation or similar.

We reserve the right to monitor our supply partners' compliance with our expectations, e.g. by means of auditing. Should serious violations be identified, we reserve the right to appropriate contractual consequences, including termination of the business relationship. In any case, we expect that any violations that are identified will be dealt with by appropriate preventive or remedial measures.

5.3 Notice regarding violations

We shall view any violation of the Code of Conduct as a serious offence. In the event of reports of violations, we will initiate measures for proper and confidential clarification and, if necessary, take appropriate countermeasures in terms of remediation or prevention. We encourage our employees, business partners and other persons to address any violations openly or anonymously via this whistleblower portal.

In addition, your direct supervisors and especially the company management are available as dialogue partners. We guarantee that all reports will be treated confidentially and with appropriate care and that whistleblowers will not suffer any disadvantages.