

Code of Conduct for Suppliers and Major Clients

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Preamble

Founded in Austria in 1872, today legero united is an internationally successful shoe manufacturer with its headquarters in Feldkirchen bei Graz. As an owner-managed, independent company, Legero Schuhfabrik GesmbH and all of its subsidiaries and affiliated companies ("legero united") has two locations in Austria and its own production sites in Hungary, Romania and India. Our team of shoemakers use their commitment and knowledge to ensure total success of the company. For us, doing business successfully means fulfilling our social and environmental responsibilities in a comprehensive way. In all our decisions and activities, we always consider the associated environmental and social impacts.

For many years legero united has maintained worldwide business relations and employed workers from all over the world. The company is aware of its responsibility to care for everyone. This applies to all employees, regardless of whether they are directly employed by legero united or not.

This Code of Conduct defines the basic requirements of legero united for production sites and all other business relations of legero united.

1. Jurisdiction

This Code of Conduct (hereinafter referred to as "CoC") forms the basis of all business relations regarding all production processes as well as all production sites on both national and international level. It applies to legero united itself, including all legero united officers, directors and employees as well as for all direct partners and for all those who are appointed or engaged by direct partners and who are thus integrated into the production process or into any other business relationship with legero united. By signing, all partners commit themselves to comply with the principles set out in this Code of Conduct.

2. Compliance with laws

All partners must comply with all national and international rules and regulations, industrial minimum requirements, United Nations Universal Declaration of Human Rights, the ILO Core Labor Standards, the UN Guidelines on Business and Human Rights and the OECD Guidelines for Multinational Enterprises as well as any other relevant conditions or standards, where the strictest requirements are always applied.

3. Social standards

Ban on forced labour

Legero united expects that partners comply with all applicable local laws and regulations with regard to slavery and forced labour at all times. Employees are to be employed exclusively on the basis of voluntary agreements. All forms of forced and compulsory labour, debt bondage, serfdom or slave labour as well as conditions similar to slavery are expressly prohibited, if they do not meet the requirements of the ILO conventions. No employee shall be forced to work directly or indirectly through violence and/or intimidation. Every worker has the right to terminate the employment relationship in accordance with the contractual agreements.

Exclusion of child labour

The employment of children is forbidden. Any exploitation of children and adolescents will not be tolerated by legero united. Only employees who have

- a. exceeded the national minimum age for employment or
- b. exceeded the compulsory school age at the beginning of their employment will be hired.

The higher age and in any case a minimum age of 15 years (irrespective of any existing laws) shall apply to be hired. Employees under the age of 18 years old may not work more than 8 hours a day, may not perform any night work or work under conditions, which are harmful for the health, the safety or the moral perception of youths and/or their physical, mental, spiritual, moral or social development.

Ban on discrimination

Any form of discrimination based on gender, age, skin colour, religion, marital status, caste, pregnancy, illness, union membership, political views, physical or mental disability, ethnicity, national and social origin, nationality or sexual orientation shall be prohibited at legero united and its partners. Legero united expects its partner to treat all employees fairly, ethically, respectfully and with dignity. In addition, the principle of equal pay for men and women workers for work of equal value should apply.

Right of association and the right of collective bargaining

legero united and all business partners recognise that all employees have the right to found and join trade unions. The right to collective bargaining is guaranteed as well. People who represent the rights of the employees must not be discriminated against. They must also be guaranteed access to all workplaces so that they can carry out their functions properly. In countries, in which the law forbids or restricts freedom of organization or collective bargaining, the business partners may, in compliance with the ILO core labor standards, not prevent alternative and legal forms of independent and free worker representation and collective bargaining.

Remuneration

The working income complies with the comparable standards of each respective country and it shall in no case be lower than the minimum wage applicable to the industry or, if higher, the industrial standards approved on the basis of collective bargaining. The amount of remuneration must ensure the cover of basic necessities and enable them and their families a dignified life, as well as to social benefits granted by law. All partners of legero united must as well pay their employees a wage for overtime or grant a corresponding time compensation for worked overtime as well as paid leave. Wage deductions resulting from direct or indirect disciplinary measures are prohibited. Wages may not be withheld and must be paid regularly in a way that is practical for workers.

Health and safety

Safe, hygienic and healthy working conditions are to be ensured. All necessary measures will be taken to avoid accidents in the workplace and protect the health of the employees. As a minimum, partners of legero united must comply with all applicable health and safety laws, regulations and standards. The supplier shall take appropriate action, such as policies, standards, procedures, contingency measures and management systems, in order to prevent occupational illnesses and work-related accidents and to provide a safe and healthy workplace to its employees. Clearly defined rules and flows for safety, fire prevention and health protection need to be developed. If personal protective equipment is required, then this should be made available. If the employees are at risk, they have the right to leave the workplace immediately and without permission. Adolescents, young mothers and pregnant women as well as people with disabilities shall receive special protection.

Partners of legero united shall ensure that all employees are properly and regularly trained with regard to health and safety at work.

Working hours

Working hours shall comply with the current law, industrial standards or relevant International Labour Organisation (ILO) conventions, whichever is stricter. The maximum permitted weekly working time is in accordance with national legislation, but on a regular basis it may not exceed 48 hours. Overtime may not be worked on a regular basis, whereby a total working time of 60 hours per week may not be exceeded.

Sufficient break periods must be guaranteed in the operational flow. The business partners shall additionally respect the right of all employees to at least one workfree day after 6 consecutive workdays as well as the right to statutory and/or religious public holidays and leave. The business partners shall respect the right of the employees to be able to leave the business premises after the end of the regular working hours.

Bribery, corruption and anti-trust

Any form of bribery, corruption, blackmail or embezzlement is prohibited. All employees of legero united, all partners as well as their employees are obligated to act professionally and to refrain from personal dependencies, obligations or influences of any kind. Gifts that are in keeping with the custom and courtesy of a particular nation or culture must not result in mandatory dependencies.

Partners of legero united must comply with all applicable laws and regulations on corruption, bribery, prohibited business practices and extortion. Any evidence of corrupt conduct should be reported to legero united immediately.

Furthermore, partners of legero united must comply with anti-trust laws and regulations, protect and respect confidential information, intellectual property and business secrets of legero united and its partners.

Legally binding employment relationship

All employment relationships must be legally binding and obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided. A continuing education and training programmes for employees, and support for personal development shall be provided.

Data Protection

Legero united and its employees respect the confidentiality of personal data and always act in accordance with the provisions of applicable data protection law.

Legero united expects partners, who collect, and process personal data shall ensure compliance with GDPR and any other applicable laws and regulations regarding data protection. The partners shall have policies and procedures in place to be able to demonstrate its commitment to data protection and privacy.

4. Environmental standards

legero united is committed to the constant and long-lasting improvement of environmental performance by promoting the introduction of appropriate technologies and production processes that enable the efficient use of natural resources and energy as well as the reduction of emissions to a minimum. At every step of the value chain, legero united and our partners aim to minimize the consumption of materials, water and energy at all sites, promote the use of renewable energy, to consistently separate waste and recycle it whenever possible, and to keep emissions to air, water and soil as low as possible. legero united strives to evaluate the chemicals used and tries to select them according to environmental, occupational health and safety as well as consumer protection aspects and to replace particularly harmful chemicals. The list of prohibited or restricted chemical substances (RSL – restricted substance list) is constantly being expanded.

legero united, together with our suppliers and partners, aims to reduce environmental impacts along our entire value chain. Our goal is to reduce our CO₂ emissions according to the SBTi target path.

Proper disposal of waste as well as possible reuse of materials within the circular economy are important, if this is possible due to local conditions. legero united uses leather solely from livestock. All rawhides that are used are exclusively by-products of food production. Tanneries are obliged to fully comply with all applicable state laws, to operate in accordance with the standards of this CoC and to respect animal welfare. Reptile leather or leather from other endangered animal species may not be used for legero united products. All other legero united sustainable purchase practices are laid down in the document 'Sustainable purchase practices' and need to be noticed by all partner suppliers.

As a minimum, partners of legero united must comply with all applicable environmental laws, regulations and standards. Legero united expects that its partners have policies and procedures in place for the avoidance of environmental harm and pollution as well as established organizational structures and procedures for the management of environmental risks.

Material compliance

Legero united is committed to comply with regulatory requirements regarding the prohibition and restriction of materials and substances, including hazardous substances and chemicals. Partners of legero united shall ensure that all goods and products provided to legero united are in compliance with the requirements covered under the scope of all applicable regulations on local and international level.

5. Supplier relationships

legero united expects that its direct partners and suppliers communicate all the principles and requirements to their subcontractors and other appointed or engaged parties. Direct partners of legero united are also expected to consider the principles and requirements set forth in this Code when engaging with subcontractors or other third parties. In order to fulfil their contractual obligations, suppliers shall encourage (and if possible, legally bind) their subcontractors and suppliers to comply with the standards outlined about human rights, working conditions, prevention of corruption and environmental protection.

legero united aims to cooperate only with direct and indirect partners and suppliers that

- use substances that are harmless to health or the environment for their products, production and other processes
- take measures to save resources, minimise pollution and waste as well as reduce energy and water consumption and make sure to dispose of raw materials, products and waste in an environmentally friendly manner
- build trust through transparent business activities and focus on a long-term partnership
- work with certified production sites and promote improvements in working conditions

Environmentally and socially compatible production should be promoted and improvements to this effect should be made. Legero united reserves the right to regularly screen its partners and suppliers in relation to compliance with this Code of Conduct.

6. Controlling

Legero united reserves the right to monitor compliance with the provisions of this Code of Conduct. Partners of legero united shall keep record of all relevant documentation in relation to compliance with this Code of Conduct. Partners of legero united are obliged to respond in a timely manner to requests for evidence of compliance with this Code of Conduct. Legero united reserves the right to audit and inspect operations and facilities of partners. Partners are obliged to report to legero united any arising issues that are likely to constitute a breach of this Code of Conduct.

7. Appeal procedure

Legero united encourages everybody to speak up and report any potential breaches or violations of this Code of Conduct. Violations of this Code of Conduct can be reported anonymously at any time to the following contact person at legero united. Legero united commits to keep the identity of the reporting person confidential as well as any information received. Disciplinary measures against the reporting person are prohibited.

We confirm with our signature to have read and understood the requirements and to fulfil these requirements unrestricted and without changes.

8. Contact details legero united

General E-Mail: sustainability@legero-united.com