

We,

NOON GmbH

- base our Code of Conduct on the CoC of the German textile and fashion industry as a voluntary self-declaration,
- assure that we share the objectives and content of the Code of Conduct and will make appropriate and reasonable efforts, within our respective capabilities, to comply with the Commitment on an ongoing basis at all of our sites.
- communicate the contents of the Code of Conduct in an appropriate manner to our employees, business partners and other key stakeholders,
- expect our suppliers to adhere to the contents of the Code of Conduct or another comparable code of conduct and encourage them to demand this from the contractual partners in their supply chain; and
- take any breach of the Code of Conduct seriously and allow our employees, business partners and others to bring any breaches to our attention in confidence using the contact details below:

contact possibility

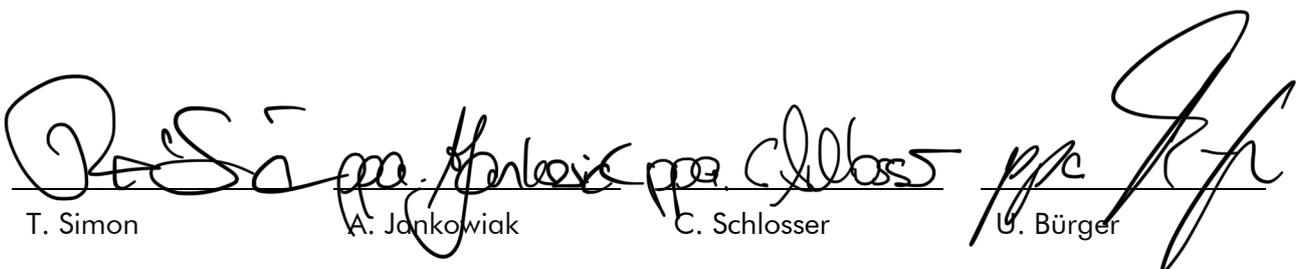
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0 Preamble

Through their economic activities, companies in the German textile and fashion industry make a valuable contribution to the sustainable development of the countries and regions in which they operate. The companies are committed to the principles of the social market economy and to free and fair world trade. They are aware of their social responsibility and advocate an economically, socially and ecologically sustainable design and development of their supply chains at home and abroad.

The Code of Conduct reflects the common basic understanding of socially responsible corporate action in the sectors of the German textile and fashion industry. At the same time, it serves as an orientation framework against which the companies can individually align their decisions and measures, and in particular takes into account the concerns of small and medium-sized enterprises and their challenges in an increasingly global and networked economy.

Contractual claims and other rights in favour of third parties are not to be established by this voluntary commitment.

1 Basic understanding and validity

We, NOON, see ourselves as part of the societies in which we operate and are committed to socially responsible corporate governance by taking into account the direct and indirect effects of our business activities on society and the environment and continuously striving to achieve an appropriate balance of interests in economic, social and ecological terms.

We act in accordance with generally accepted values and principles such as integrity and legality, and in particular observe internationally recognised human rights and labour standards.

We share the objectives and the contents of the Code of Conduct and will, within the scope of our respective legal and factual possibilities, make all appropriate and reasonable efforts to comply with the voluntary commitment on an ongoing basis at all our company locations in Germany and abroad.

If existing national regulations conflict with the contents of the Code of Conduct or if the national context makes it impossible to comply with them in full, we will seek ways to nevertheless comply with the requirements of the Code of Conduct as far as possible.

2 Human rights and labour standards

We respect human dignity and internationally recognised human rights, as set out in particular in the United Nations (UN) Universal Declaration of Human Rights and addressed in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. We also take into account the internationally recognised labour standards of the International Labour Organisation (ILO), as set out below in the Code of Conduct. In all our business activities, we always strive neither to cause nor to contribute to human rights violations. We expect the same from our business partners. To the extent necessary and possible, we support our supply partners in this regard.

2.1 Employment relationships

We treat our employees with respect. We reject any form of unlawful punishment, abuse, harassment, intimidation or other undignified treatment towards employees. We comply with applicable labour laws in all employment relationships and expect the same from our contractors. Employees shall be provided with comprehensible information on the essential terms and conditions of employment, including their rights and obligations as well as working hours, remuneration and payment and settlement modalities, at the beginning of the employment relationship. We respect and protect the right of employees to terminate their employment relationship in compliance with the relevant notice period.

2.2 Prohibition of child labour and protection of young workers¹

We do not tolerate child labour and observe the applicable legal minimum age for admission to employment. In any case, we do not employ persons under the age at which compulsory schooling 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 in order to prevent child labour.

Should child labour be identified, all necessary measures that focus on the well-being, protection and development of the child shall be taken immediately.

In the case of persons under 18 years of age, the rights of young workers must be respected; they may only be employed if it is ensured that the working and employment conditions do not pose a risk to their health, safety or morals, nor are harmful to their development.

2.3 Prohibition of forced labour²

We reject any form of forced or compulsory labour, including any form of bonded labour, servitude, slavery or slavery-like practices, trafficking in human beings or other involuntary labour and services that are incompatible with internationally recognised labour and social standards.

2.4 Remuneration³

We comply with the statutory provisions or - where applicable - the provisions of collective bargaining agreements in the remuneration of labour services. We ensure that the wage we pay does not fall below the applicable statutory or applicable collectively agreed or industry-standard minimum wage. In countries or regions without a statutory or collectively agreed wage framework, we take special care to ensure that the wage paid is sufficient for a regular full working week to meet the basic needs of the employees. We do not tolerate wage deductions that are not permitted by law, including wage deductions as a disciplinary measure.

2.5 Working hours⁴

We comply with the statutory or applicable collective agreement provisions on working time, including overtime, rest breaks and recuperation leave. In any case, we ensure that:

- - the regular weekly working time does not exceed 48 hours plus a maximum of 12 hours overtime per week,
- - the right to rest breaks is respected on each working day,
- - six consecutive working days are regularly followed by a day off; and

¹ ILO-Übereinkommen Nr. 138 und 182

² ILO-Übereinkommen Nr. 29 und 105

³ ILO-Übereinkommen Nr. 26 und 131

⁴ ILO-Übereinkommen Nr. 1; ILO-Empfehlung Nr. 110

- - public or religious holidays and holidays are respected.
- - Overtime shall be compensated or remunerated at least in accordance with the statutory or collectively agreed regulations; it shall be ordered exceptionally and exclusively on a statutory, collectively agreed or contractual basis.

2.6 Freedom of association⁵

We respect the right of workers to freedom of association, freedom of assembly and the right to collective bargaining and collective bargaining to the extent that 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, prohibition of discrimination⁶

We promote a work environment that enables inclusion and values the diversity of our employees. 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 origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief. We also take into account the principle of equal pay for male and female workers for work of equal value.

2.8 Health and safety in the workplace⁷

We comply with national and international occupational health and safety standards and provide a safe and healthy working environment to maintain the safety and health of our employees, protect third parties and prevent accidents, injuries and work-related illness. This includes regular workplace risk assessments and the implementation of appropriate hazard prevention and precautionary measures, including the provision of appropriate personal protective equipment. We ensure that our employees are trained in all relevant occupational safety topics.

⁵ ILO-Übereinkommen Nr. 11, 87, 98, 135 und 141

⁶ ILO-Übereinkommen Nr. 100, 111 und 159; ILO-Empfehlung Nr. 165

⁷ ILO-Übereinkommen Nr. 155, 183 und 184; ILO-Empfehlung Nr. 164

3 Ecological responsibility

The protection and preservation of the natural basis of life concerns and obliges us all. With this in mind, we conduct our business activities with due regard for ecological aspects and are committed to the goal of a climate-neutral future.

3.1 Protection of the environment and climate

- We fulfil 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 that are guided by legal and internationally recognised standards and cover, among other things, the following topics:
 - - Professional and responsible handling of hazardous substances and other chemicals and waste, including disposal;
 - - Efforts to reduce or avoid waste and minimise emissions from operations (e.g. waste water, exhaust air, noise, greenhouse gases);
 - - Conservation of natural resources, for example through measures to save water, chemicals and other raw materials;
 - - Promotion of the use of climate- and other environmentally friendly technologies, processes, raw materials and products;
 - - Efforts to increase energy efficiency and the share of green or renewable energies in energy consumption at our company locations.

3.2 Animal and species protection

We observe the principles for the protection of animals 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 must be observed.

4 Ethical business and integrity

We pursue only legitimate business goals and practices and maintain business relationships only with reputable partners. We behave fairly and appreciatively 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 business activities on universally valid ethical values and principles, including integrity and respect for human dignity. We support free and fair global trade and comply with the laws and regulations of the countries and regions in which we do business.

4.1 Corruption , trade control, money laundering

We reject any form of bribery and corruption and already avoid any appearance of it - be it in the form of granting or accepting unfair advantages. We act in accordance with applicable import and export control regulations and comply with legal requirements for the prevention of money laundering.

4.2 Fair competition

We advocate 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 through unfair business practices.

4.3 Personal data, protection of confidential information and intellectual property

We respect the personal rights of our employees, business partners and customers and comply with the applicable legal and regulatory requirements for the processing of personal data and for information security when handling personal information. We take great care to ensure that the trade secrets and other confidential information of our business partners and customers entrusted to us are adequately protected against unauthorised acquisition, use and disclosure, at least in accordance with the relevant legal provisions on the protection of trade secrets.

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

4.4 Consumer interests

Insofar as our products and services affect the interests of consumers, we have taken appropriate measures to ensure the safety and quality of the products or services we offer. In doing so, we ensure that our products or services comply with the relevant statutory consumer protection provisions. In the context of information and sales measures, we take consumer interests into

account by applying fair business, marketing and advertising practices and by promoting consumer education.

We pay special 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 of our company's locations. We have established suitable measures and processes for this purpose and document their implementation within the company in an appropriate manner. The company management informs itself at regular intervals about the implementation and work of the responsible offices 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. We expect our employees to comply with the Code of Conduct.

5.2 Expectations of our supply chains, control measures

By agreeing to a business relationship, we expect our suppliers and contractual partners to adhere to the contents of the Code of Conduct or at least to apply a comparable code of conduct. The contents of this document reflect our minimum expectations of our supply partners and other contractual partners. If our suppliers and partners commission a third party with services or production tasks related to the NOON value chain, they must ensure that their practices are also in line with this Code of Conduct.

As a matter of principle, we focus on long-term business relationships based on partnership. We therefore identify and check 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 supplier partners for compliance with our expectations,

z. e.g. by means of auditing. If serious violations are found, we reserve the right to appropriate contractual consequences, including termination of the business relationship. In any case, we expect that identified violations will be responded to with appropriate preventive or remedial measures.

5.3 Notice of violations

We take every violation of the Code of Conduct seriously. In the event of reports of violations, we initiate measures for proper and confidential clarification and, if necessary, take appropriate countermeasures in terms of remediation or prevention.