

## Scope of application

This policy applies to all applicants for employment with the Company and to employees, whether they relate to the conduct of co-workers or anyone not directly associated with the Softline Group of Companies (hereinafter referred to as Softline ) (for example, an external supplier, consultant or client).

Conduct prohibited by these policies is unacceptable in the workplace and in work-related settings outside the workplace, such as business travel, business meetings, and business-related public events.

Softline's policy promotes a work environment of respect and dignity. Every employee has the right to work in a professional environment that promotes equal opportunities for career advancement and eliminates unlawful discriminatory practices, including harassment. Therefore, Softline expects all relationships within the Company to be professional and free from discrimination, prejudice, and harassment.

Softline has developed this policy to ensure that all employees have the opportunity to work in an environment free from retaliation for reporting policy violations, discrimination, and harassment. Softline will make every reasonable effort to ensure that all individuals affected by these policies are aware that any complaint regarding violations of these policies will be investigated and handled appropriately. Any Softline employee may report policy violations or any suspected violations in accordance with Softline's Whistleblowing Policy .

Any differences in people based on sex, gender, religion, or age should not and cannot be used as grounds for excluding or singling out individuals of a certain gender or other characteristics that could lead to their exclusion from participation in business processes or work-related public activities or discussions. In other words, to avoid accusations of harassment, employees must not engage in discrimination or the provision of unequal rights and opportunities. Softline's legislation and policies prohibit differential treatment of people based on gender or other legally protected characteristics with respect to terms, conditions, privileges, and additional benefits in employment. The prohibition on harassment, discrimination, and harassment is intended to complement and strengthen these policies, not to form the basis for exceptions from them.

## Equal employment opportunities

Softline's policy is to ensure equal employment opportunity without discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, genetic information, or other characteristics protected by law. Softline prohibits any such discrimination or harassment. However, while not discriminating based on age, Softline does not employ child labor.

## Sexual harassment

Sexual harassment constitutes discrimination and is illegal under the law. For the purposes of this policy, "sexual harassment" is defined as such in the Equal Employment Opportunity Commission Guidelines: unwanted advances, requests for sexual intimacy, and other verbal or physical conduct of a sexual nature, such as:

- consent to such conduct is made explicitly or implied as a condition of the person's employment;
- consent or refusal to accept such conduct becomes the basis for employment decisions concerning that person;
- such conduct has the purpose or effect of unreasonably interfering with a person's performance of work or creating an intimidating, hostile or offensive workplace environment.

There are two types of sexual harassment:

- Qui pro quo (“quid pro quo”);
- Hostile work environment.

Sexual harassment can involve a range of subtle and highly visible behaviors and may involve individuals of the same or different gender. Depending on the circumstances, such behavior may include unwanted advances or requests for sexual intimacy; sexual jokes and innuendo; offensive sexual remarks; comments about an individual's body, sexuality, or sexual disabilities; leering, whistling, or touching; offensive or obscene remarks or gestures; placing or distributing sexually suggestive objects or images in the workplace; and other physical, verbal, or visual conduct of a sexual nature.

## Persecution

Harassment based on other characteristics protected by law is also strictly prohibited. This policy defines harassment as verbal, written, or physical conduct that insults, disparages, or demonstrates hostility or disgust toward an individual based on their race, color, religion, sex, sexual orientation, gender identity or expression, nationality, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, as well as similar actions against their relatives, friends, or partners who:

- have the purpose or effect of creating an intimidating, hostile or offensive workplace environment;
- have as their purpose or consequence unreasonable interference in the performance of work by a person;
- otherwise negatively impact a person's ability to work.

Harassment includes the use of offensive epithets, innuendos or negative stereotypes; threats, intimidation or hostile actions, derogatory jokes; written or graphic materials that defame or demonstrate hostility or disgust towards an individual or group, which are posted anywhere on the employer's premises in a public place, distributed in the workplace, during working hours or outside working hours and using company equipment, by email, telephone (including voice messages), SMS, social media and other means of communication.

## Reporting harassment, discrimination, and protection from retaliation for reporting violations

Softline welcomes reports of all observed instances of discrimination or harassment. Softline's policy is to promptly and thoroughly investigate such complaints. Softline prohibits retaliation against anyone who reports discrimination or harassment or participates in an investigation of such complaints.

Any employee who has questions or concerns regarding this policy should speak with the Director of Human Resources or a member of the Human Resources Policy Committee.

Softline welcomes reports of all observed instances of discrimination, harassment, or stalking, regardless of the perpetrator's identity or position. Individuals who believe they have been the victim of such behavior should discuss their concerns with their immediate supervisor, any member of the HR Policy Committee, a representative of the HR Department, or the Ombudsman. The complaint procedure is described below.

In addition, Softline recommends that individuals who believe they are being subjected to such treatment immediately inform the offender that their behavior is offensive and request that they cease. Softline, however, acknowledges that individuals may prefer to resolve the matter through the complaints process.

Retaliation against an individual for reporting harassment, harassment, or discrimination, or for participating in an investigation of a complaint of harassment, harassment, or discrimination, is considered a serious violation of this policy. Like harassment, harassment, and discrimination themselves, retaliation for reporting them may be grounds for disciplinary action. Retaliatory actions should be reported promptly; they will be promptly investigated and appropriate action taken.

## Complaint procedure

Individuals who believe they have been victims of, or who believe they have witnessed, conduct prohibited by this policy should discuss their concerns with their immediate supervisor, a representative of the HR Department, any member of the Human Resources Policy Committee, or the Ombudsman.

Softline encourages prompt reporting of complaints and concerns, as this facilitates prompt and constructive action before relationships are irrevocably damaged. Therefore, while no fixed notification period is set, prompt reporting of incidents and intervention are considered the most effective method for resolving actual or suspected harassment incidents.

Any allegations of harassment, discrimination, or stalking will be promptly investigated. This investigation may include individual interviews with the parties involved and, if necessary, with individuals who witnessed the alleged conduct or have other relevant information.

Confidentiality will be maintained during the investigation to the extent appropriate for the purposes of the investigation and related corrective actions.

## Responsibility

In response to unlawful conduct, including harassment, discrimination, or bullying, appropriate action will be taken. These actions may include, but are not limited to, training, counseling, or disciplinary action such as a warning, reprimand, denial of promotion or salary increase, transfer to another position, temporary layoff without pay, or termination of employment, depending on what Softline deems appropriate in the circumstances.

If the party against whom the complaint is filed does not agree with the decision made, that party may appeal to senior management.

False and malicious complaints of harassment, discrimination, and bullying (as opposed to complaints made in good faith, even if they are fundamentally wrong) may be grounds for appropriate disciplinary action.

**General Director of the Softline Group of Companies  
Lavrov V. E.**