

1. Introduction

Softline Group of Companies and its subsidiaries (" Softline ") strive to conduct their business transparently and in accordance with the highest ethical standards. This means that Softline's business must always be conducted in strict compliance with all applicable regulations.

Softline strives for mutually beneficial relationships with suppliers based on shared values and predictable behavior. Softline's Code of Corporate Ethics and Compliance (the "Code") describes the behavior we expect from employees. Softline's Supplier Code of Conduct (the "Supplier Code") contains provisions that apply to suppliers as an important part of our supply chain.

2. Principles

Softline is committed to responsible and sustainable business practices. We demand the same from our suppliers. Our Code and Supplier Code are based on Softline's Values , described below:

Leadership

- We strive to be number one in our key business areas. We are accountable for our promises and actions.
- We love what we do. We're curious, assertive, and never stop evolving. Our confidence is rooted in practical experience, allowing us to confidently take on commitments and be accountable for results.

Customer Focus

- We listen to our clients, hear them, and create value for their businesses. We are committed to understanding and solving their challenges.
- We strive to build long-term, trusting relationships with our clients and always deliver on our promises. We offer a variety of options to find the most effective solution for each task. This allows us to effectively collaborate and improve together with our clients and partners.

The team is the core of our business

- Team success is everyone's success.
- We are one global team.

Softline adheres to the principle of trusting and honest partnership with its employees. We value the contribution of each employee, their professionalism, and their commitment to the common cause. Softline team members respect each other and all cultures. We help our employees grow and develop. We promote learning not only through courses and standard programs, but also through the support of experienced colleagues, an internal knowledge base, and opportunities to participate in various projects, including international ones.

Innovations

- We know and anticipate market development trends.
- We are focused on finding opportunities for growth.

- We invest heavily and place great emphasis on cutting-edge technologies and innovative projects.
- We constantly monitor the latest trends and technologies, integrating the best approaches and solutions into our portfolio. We actively develop our own products and services.

Everything changes, and so do we. We are committed to learning and self-improvement. We take matters into our own hands and, together with our clients and partners, shape the future.

Responsible business

- We support the rational use of resources and a healthy lifestyle.
- We comply with the law and business ethics.
- We respect traditions and cultural diversity.
- We participate in charity campaigns and educational initiatives.

3. To whom does the Supplier Code apply?

This Supplier Code applies to suppliers of goods and services and their employees in their work with Softline through contracts. It does not apply to one-time transactions such as taxi rides, restaurant dinners, or any similar transactions. The group we collectively refer to as "suppliers" includes suppliers, distributors, subcontractors, consultants, intermediaries, and agents. As a supplier, you must ensure that the practices and principles set forth in this Supplier Code are implemented throughout your entire supply chain.

4. Mandatory requirements for doing business with Softline

4.1 Conflict of Interest

Softline respects the confidentiality of its suppliers. However, situations where personal interests conflict with business interests must be avoided. Therefore, it is unacceptable for decisions to be based not only on business expediency but also on reasons influenced by the personal interests of supplier managers or employees.

Suppliers shall avoid any interaction with any Softline employee that may conflict or appear to conflict with Softline's interests .

For example, suppliers must not employ or otherwise make payments to any Softline employee during any transaction between the supplier and Softline . If a supplier's employee has a family relationship with a Softline employee (e.g., is a spouse, parent, sibling, grandparent, child, grandchild, mother, etc.), or if the supplier's employee has any other relationship with a Softline employee that could present a conflict of interest, the supplier must disclose such circumstances to Softline .

Conflicts of interest involving a Softline employee must be clearly documented in writing. To identify any conflict of interest, suppliers should contact the relevant Softline manager or the Director of Internal Control and Compliance ("Director of Ethics and Compliance").

4.2 Gifts and hospitality

Suppliers must not provide Softline employees with any gifts, travel, meals, or entertainment in any situation where it influences or could influence the employee's decision regarding the supplier. Depending on the circumstances, suppliers may provide

Softline employees with modest gifts and reasonable and justifiable entertainment expenses within the context of the business relationship, as long as they do not violate any regulations and:

- are not cash or cash equivalent;
- is consistent with the usual business practices and policies of the supplier company;
- are not done often and are not expensive.

This rule also applies to family members of Softline employees .

4.3 Practice of combating bribery and corruption

Suppliers shall not engage in any form of commercial bribery or bribes or otherwise offer any inducements to Softline employees, family members or friends for the purpose of obtaining or retaining Softline business .

Suppliers must comply with applicable anti-bribery laws and regulations, as well as international regulations regarding bribery of public officials or private individuals.

In connection with any transaction involving the production, distribution or delivery of goods or services for Softline , or which is otherwise related to Softline , the supplier shall not transfer anything of value, directly or indirectly, to any person who meets the criteria of a public official in accordance with Softline's Anti-Corruption Policy , for the purpose of obtaining any improper benefit or advantage (for example, in connection with regulatory approvals, customs procedures, judicial and legislative proceedings), or to any private person.

Suppliers must maintain current and accurate written records of all payments (including any gifts, meals, entertainment, or anything else of value) made on behalf of Softline or from funds provided by Softline . Suppliers must provide Softline with copies of these payments upon request.

4.4 Accounting and business documentation

Accurate, reliable information and records are critical to fulfilling Softline's financial, legal, and managerial obligations and are necessary to accurately reflect Softline's transactions .

Suppliers

must maintain accurate records of all matters related to the supplier's activities with Softline .

This includes proper, prompt, and complete recording of all expenses and payments, as well as the availability of supporting evidence and documentation. Suppliers must not obstruct, delay, or otherwise interfere with Softline's proper and timely processing of accounting documents. Altering or manipulating any document in a way that could affect transparent and accurate recording is considered a serious violation.

Softline assets

Softline's property, materials, equipment and other assets , suppliers shall act responsibly and ensure that any such assets are used for their intended purpose and by properly authorized persons.

Suppliers must protect and responsibly use Softline's property and other tangible and intangible assets. Suppliers must not use any Softline trademarks or any other intellectual property unless expressly permitted by Softline in writing.

4.6 Use of technological resources

When the supply of goods or provision of services requires the use of Softline equipment, systems and technological devices , suppliers may not do so for purposes other than those permitted by Softline or that are directly related to the fulfillment of the objectives of the relevant agreement.

Suppliers using Softline's technological resources must be informed of the restrictions for users and must not violate license agreements or do anything that could jeopardize Softline or expose Softline to liability to any third party or government authorities.

Softline's technological resources must be carried out in accordance with current legislation and Softline's policies .

Softline reserves the right, at any time and without notice, to monitor the use of its resources and information technology and, consequently, to access, view, copy, or extract files, documents, records, databases, electronic messages, internet activity, and any other information obtained using Softline's information technology resources . Accordingly, users of Softline's information technology resources have no expectation of privacy regarding information or messages created, transmitted, or stored using Softline's information technology resources .

The information and data stored by Softline , its resources and information technology (including Softline's computers) belong to Softline , and, accordingly, Softline may provide this information to regulatory authorities or other third parties if it deems it necessary or appropriate, and if the provision of this information is required by law.

4.7 Information security and lawful use

Suppliers shall maintain the confidentiality of all information to which they have access in the performance of their work, provision of services or supply of goods to Softline , even if such information is not secret or does not relate to Softline , and shall take measures to prevent its misuse, theft, fraud, or improper disclosure.

In all cases, suppliers must use information they receive or may have access to lawfully, for the specific purpose for which it was disclosed, received, or accessed, and in accordance with applicable laws (including, but not limited to, antitrust, consumer protection, data privacy, etc.). Softline does not accept any unlawful, unfair, unauthorized, illegal, or improper use of any information, even if the same benefit would result in an advantage for Softline .

Suppliers must exercise due care when handling, discussing, or transmitting sensitive or confidential information that could impact Softline , its employees, customers, the business community, or the general public. Suppliers are directly responsible for taking necessary measures to protect Softline's information from damage or loss and to ensure its safe storage. Disclosure of financial information may influence the actions of shareholders and potential investors and may violate securities laws. Suppliers' responsibility to protect

Softline's confidential information remains unchanged even after their selection or contract with Softline .

4.8 Confidentiality of personal data

Suppliers are committed to meeting reasonable expectations regarding the privacy of the personal information of everyone with whom they do business, including suppliers, customers, consumers, and employees. They must comply with privacy/data protection and information/cybersecurity laws, as well as regulatory requirements, when collecting, storing, processing, transferring, and sharing personal information.

Suppliers are required to create and maintain documents and records to ensure regulatory compliance and compliance with company requirements, along with appropriate confidentiality to protect personal information.

When processing personal data on behalf of Softline as processors/importers or joint controllers, suppliers undertake to conduct a privacy/data protection assessment and maintain appropriate data exchange documentation.

4.9 Insider trading

If Suppliers have knowledge of material non-public information relating to Softline or its business, they may not buy, sell or otherwise trade in the securities of Softline or any company that trades with Softline , or engage in any other action to take advantage of that information.

4.10 Compliance with the Law

Suppliers are responsible for ensuring that their directors, officers, employees, subcontractors, representatives, or agents understand and comply with this Supplier Code, including where this Supplier Code sets a higher standard than, but does not conflict with, legal requirements. Tradition or local customs never take precedence over legal requirements.

4.11 Fair, honest and transparent competition

Softline is committed to the values of fair, honest, and transparent competition. Competition and antitrust laws worldwide are designed to prohibit unreasonable restraints of trade and preserve competition. Softline expects its suppliers to comply with such laws and avoid competition/antitrust violations, including price fixing, bid rigging, market or customer allocation, and abuse of dominant position.

Violations of competition and antitrust laws carry severe penalties. In addition to fines and other penalties, those found guilty of the most serious offenses face imprisonment. Softline is committed to strictly complying with applicable competition and antitrust laws.

4.12 Combating money laundering and terrorist financing

Softline strictly complies with all applicable anti-money laundering (AML) and countering the financing of terrorism (CTF) laws and regulations. Softline expects its suppliers to:

- not knowingly participate or attempt to participate in any transactions involving proceeds from illegal activities;
- comply with relevant AML/CTF obligations with the utmost care and promptly report to us any suspicions of money laundering or terrorist financing;
- Do not deal with certain individuals or entities (such as suspected terrorists or drug traffickers) who are subject to trade restrictions.

4.13 Trade Restrictions

Supplier's transactions with Softline must always strictly comply with applicable trade restrictions, including export control regulations.

In executing the relevant agreement or any transaction related to Softline , suppliers must not interact in any way with persons subject to applicable trade restrictions.

4.14 Labor and human rights

Softline is committed to conducting all its activities in full compliance with the principles of protecting and respecting human rights applicable to business and the Universal Declaration of Human Rights. Softline expects its suppliers to adhere to the same standards.

Softline rejects all forms of forced or child labor, as well as modern slavery and human trafficking. This position applies not only to our company but also to our suppliers. Forced labor is any work or service that a person is forced to perform against their will under threat of punishment, or work to which the person has not voluntarily consented.

Suppliers must operate in accordance with the principles set forth in the ILO (International Labour Organization) Declaration of Fundamental Principles and Rights at Work . These include the prohibition of child labor, forced labor, and discriminatory conduct, as well as the recognition of the rights to freedom of association and collective bargaining.

Softline values and respects the culture and traditions of the communities in which it operates and actively works to consider the health, safety, environment, human rights and economic well-being of these communities in its activities and expects its suppliers to follow, respect and promote such values in all relationships and transactions with Softline .

4.15 Discrimination and Harassment

Softline strives to create and maintain a work environment in which every employee has the opportunity to grow, develop, and fully contribute to Softline's success . Sexual harassment, bullying, or discrimination against any employee is unacceptable.

Suppliers shall not discriminate against any person in employment practices, including hiring, salary, benefits, promotion, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion or social attitudes or ethnic origin.

Suppliers must treat their employees with respect and dignity. No employee should be subjected to physical, sexual, or psychological harassment or violence.

4.16 Health and Safety

Suppliers shall provide a safe and healthy working environment to prevent accidents and injury to health arising out of the performance of work or the operation of the employer's facilities.

In addition, any supplier representative providing services at a Softline facility is required to comply with all Softline health and safety standards.

4.17 Environment

Softline strives to continually improve its environmental performance, focusing its efforts on those areas most impacted by our sales, distribution, and offices. Softline strives to comply with and expects all suppliers to comply with both the spirit and the letter of applicable environmental regulations. Where these do not exist, suppliers are required to set appropriately high standards for themselves.

Suppliers must ensure they comply with all applicable environmental laws and regulations and take a precautionary approach to addressing environmental issues, implementing initiatives aimed at increasing environmental responsibility, and developing and disseminating environmentally friendly technologies to the best of their ability. The scope of these environmental plans should be commensurate with the nature of the supplier's business and the risks associated with it.

4.18 Reporting Violations

Suppliers who believe that a Softline employee, anyone acting on behalf of Softline, or any employee or representative of suppliers involved in services or deliveries to Softline has engaged in illegal or inappropriate conduct or any potential violation of this Supplier Code must promptly report it through the appropriate manager, the Chief Ethics and Compliance Officer, or by email at speakup@softline.com. For more information, please see the Whistleblowing Policy.

Reporting potential misconduct in good faith will not impact suppliers' relationships with Softline. Similarly, suppliers must not retaliate or retaliate against those who report suspected or known violations in good faith. "Good faith" implies that the individual believes or understands that the information is true.

4.19 Evaluation and monitoring of suppliers

Softline's supplier management and evaluation process. In accordance with Softline's risk-based approach, suppliers may be entitled to provide specific or additional credentials and comply with additional measures to verify compliance with this Supplier Code. Therefore, Softline reserves the right to periodically request information from suppliers, including conducting inspections and/or audits—with or without third-party support—of facilities, operations, and related books and records to confirm suppliers' compliance with the Supplier Code.

If a supplier fails to comply with the Supplier Code and such failure is not insignificant, Softline reserves the right to terminate the agreement and business relationship with the

supplier without prejudice to any other rights and without resorting to available legal remedies.

Vladimir Lavrov,
CEO of the Softline Group of Companies