

## 1. Introduction

At the Softline Group of Companies (hereinafter referred to as "Softline "), we adhere to the principles of honesty and openness. If you witness or suspect any misconduct or unethical behavior at work, please report it. Your report can prevent violations that could damage Softline's reputation or operations , and even prevent harm to others.

Softline sincerely appreciates the assistance of employees and third parties acting on behalf of Softline who identify and report violations, unethical behavior, and potential issues that need to be addressed. Reports are welcome. You will not suffer any harm for raising your concerns in good faith, and we will not tolerate any retaliation against you for speaking out.

The purpose of this policy is to ensure that employees or any third parties can report violations, unethical behavior and potential problems without fear of reprisal.

## 2. Scope of application

The Policy applies to all Softline Employees working at any level of the organization, as well as to all third parties (business partners), including those acting on behalf of and/or at the direction of Softline , including suppliers, consultants, agency workers, contractors and other persons.

## 3. What things should be reported?

You must report any potential violation of the law, the Code of Conduct, and policies. There are many examples of things that should be reported:

- Fraud.
- Corrupt practices.
- Violation of human rights.
- Discrimination or harassment.
- Violation of competition laws and rules.
- Money laundering or violation of trade restrictions.
- Inadequate financial or non-financial accounting.
- Conflict of interest.
- Violations related to environmental protection, health and safety.
- Misuse of company resources.
- Disclosure of confidential information.
- Violation of personal data protection rules.
- Persecution of someone for speaking in good faith.
- Other violations.

Do not use this policy:

- To report events that pose an immediate threat to life, health, or property. If you need emergency assistance, contact law enforcement or emergency services.
- For any claims regarding the terms of your employment.
- To resolve personal or legal disputes.
- To knowingly make false accusations. This may result in disciplinary action and, in some cases, legal liability.

When reporting, you must ensure that you are doing so in good faith and have reason to believe the information is accurate. When reporting violations, unethical behavior, or potential problems, you are encouraged to provide as much specific information as possible, including names, dates, locations, and details of the events.

#### 4. How to report a violation or problem

##### **Option 1: Notify your immediate supervisor.**

You are advised to first report any violation, unethical behavior, or potential violation to your immediate supervisor. If you are uncomfortable contacting your immediate supervisor or they are unable to assist, you should use the methods described below.

##### **Option 2: Talk to the Chief Ethics and Compliance Officer or the Ethics and Compliance Unit.**

If your immediate supervisor is unable to resolve the situation or you are uncomfortable contacting them, you may contact the Chief Compliance Officer (CCO) or the Ethics and Compliance Unit, who will handle your request confidentially.

##### **Option 3. Notify via a special email.**

You can also report a violation, unethical behavior, or potential problem by email at [compliance@softline.com](mailto:compliance@softline.com).

#### 5. Confidentiality

When reporting a violation, your personal information will not be disclosed (except where required by law). Softline guarantees support and protection to anyone who sincerely and in good faith reports a violation, unethical behavior, or potential problem.

#### 6. What should you do if you encounter negative retaliatory measures?

If you or others have experienced negative retaliatory action because you raised your concerns in good faith, you should report this through one of the channels indicated above.

#### 7. Investigation

Softline takes every report of violations or unethical behavior seriously, so authorized parties initiate an investigation. The investigation may involve departments such as the Ethics and Compliance Unit, Security, Human Resources, and Legal. The reporter will be informed of the overall findings of the investigation within the established timeframe.

#### 8. Immediate supervisor

If an immediate supervisor receives a report of a violation, unethical behavior, or potential problem, they are required to maintain complete confidentiality regarding the report. The immediate supervisor is required to document the report, including the individuals involved, details, evidence, dates, etc., and immediately contact the Chief Ethics and Compliance Officer or the Ethics and Compliance Unit to discuss the matter further.

## 9. Participation in the investigation

When involved in an investigation, such individuals are expected to fully cooperate and answer all questions honestly and in detail. Lying, delaying, interfering with the investigation, or refusing to cooperate may result in disciplinary action. All parties involved have the right to confidentiality to avoid unnecessary damage to their reputation. Therefore, all participants are expected to maintain confidentiality regarding their participation in the investigation and the details they know.

## 10. Measures

If your concern is found to be justified (i.e. a violation or unethical behavior has actually occurred), then the necessary measures will be taken in accordance with policies and regulations.

## 11. How can a supplier report a problem?

Softline requires business partners and clients to report any violations or unethical behavior by any Softline employee. If reported, the details of business partners and clients will not be disclosed, except as required by law. The business partner or client will be informed of the investigation results confidentially, unless there are legal grounds preventing Softline from disclosing them.

## 12. What other documents do I need to know about?

- Code of Corporate Ethics and Compliance.
- Anti-corruption policy.
- Conflict of Interest Policy.
- Trade Restrictions Policy.
- Business Partner Due Diligence Policy.
- Supplier Code of Conduct.

A full list of current policies, violations of which you can report, can be found on the dedicated [Softline portal](#).

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