

Anti-Discrimination & Harassment

Disability Accommodation

To comply with applicable laws ensuring equal employment opportunities to individuals with disabilities, including but not limited to, pregnancy, lactation, childbirth and related medical conditions, the Company will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee, unless undue hardship and/or a direct threat to the health and/or safety of the individual or others would result. Any applicant or employee who requires an accommodation in order to perform the essential functions of his/her job should contact Human Resources and request such an accommodation. The individual with the disability should specify in writing what barriers or limitations make it difficult for him or her to perform the job. The Company will conduct an investigation regarding these barriers or limitations and will then identify possible accommodations, if any, that will help to eliminate the barrier(s) or limitation(s). If the accommodation is reasonable and will not impose an undue hardship on the Company and/or a direct threat to the health and/or safety of the individual or others, the Company will make the accommodation. The Company may also propose alternative accommodation. The individual is required to fully cooperate with the Company in seeking and evaluating alternatives and accommodations. The individual is required to fully cooperate with the Company in seeking and evaluating alternatives and accommodations. The Company may require medical verification of both the disability and the need for accommodation.

The Company will also grant requests for reasonable accommodations for medical conditions related to pregnancy, lactation and childbirth.

Employees who wish to request an unpaid leave of absence or who wish to extend a current leave of absence because of a qualifying disability should speak to the Human Resources Department regarding a proposed accommodation.

Religious Accommodation

We will attempt to make reasonable accommodations for employee observance of religious holidays and sincerely held religious beliefs, including time off for religious holidays and accommodations related to dress and grooming practices, unless doing so would cause an undue hardship on Company operations. If you desire a religious accommodation, you are required to make the request in writing to your supervisor as far in advance as possible.

Equal Employment Opportunity Policy

Hugo Boss Retail Inc. provides equal opportunity in all of our employment practices to all qualified employees and applicants without regard to the following legally protected characteristics: race, color, religion, creed, sex, pregnancy (including childbirth and related medical conditions), national origin, age, physical or mental disability, genetic information

HUGO BOSS

(including characteristics and testing), or any other category protected by federal, state and local laws. This policy applies to all aspects of the employment relationship, including recruitment, hiring, compensation, promotion, transfer, disciplinary action, layoff, return from layoff, training and social, and recreational programs. All such employment decisions will be made without unlawfully discriminating on any prohibited basis.

Languages Spoken at Work

Employees are prohibited from making offensive remarks or gestures toward fellow employees or visitors to the company who are not fluent in English. In turn, we urge employees not to use their fluency in another language in any way to harass or discriminate your fellow employees or visitors to our company.

Policy Prohibiting Harassment and Discrimination

Hugo Boss Retail Inc. strives to maintain an environment free from discrimination and harassment.

This policy applies to all phases of employment, including but not limited to recruiting, testing, hiring, promoting, demoting, transferring, laying off, terminating, paying, granting benefits and training.

Prohibited Behavior

Hugo Boss Retail Inc. does not and will not tolerate any type of discrimination or harassment of our employees, applicants for employment, or our customers. Discriminatory conduct or conduct characterized as harassment as defined below is prohibited.

We are committed to providing a work environment free of harassment. As a result, we maintain a strict policy prohibiting sexual harassment and harassment against applicants and employees because of the following legally protected characteristics: race, color, religion, creed, sex, pregnancy or related medical conditions, age (40 and over), national origin or ancestry, physical or mental disability, genetic information or any other characteristic or status protected by federal, state or local laws. All such harassment is prohibited. Our anti-harassment policy applies to all persons involved in our operations and prohibits harassment by any employee of the Company, including shareholders, managers and coworkers.

Sexual Harassment Defined

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to or rejection of such conduct is used as a basis for employment decisions affecting the individual; or

HUGO BOSS

- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment includes various forms of offensive behavior. The following is a partial list:

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening retaliation after a negative response to sexual advances.
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages.
- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes, comments about an employee's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes or invitations.
- Physical conduct: touching, assault, impeding or blocking movements.
- Retaliation for making harassment reports or threatening to report harassment.

This policy also protects employees from harassment by vendors or clients. If harassment occurs on the job by someone not employed by the Company, the procedures in this policy should be followed. This policy applies to males who sexually harass females or other males, and for females who sexually harass males or other females.

Other Types of Harassment

Prohibited harassment on the basis of the following legally protected characteristics: race, color, religion, creed, sex, pregnancy or related medical conditions, age (40 and over), national origin or ancestry, physical or mental disability, genetic information or any other characteristic or status protected by federal, state or local laws, includes behavior similar to sexual harassment such as:

- Verbal conduct including threats, epithets, derogatory comments or slurs.
- Visual conduct including derogatory posters, photography, cartoons, drawings or gestures.
- Physical conduct including assault, unwanted touching or blocking normal movement.

- Retaliation for making harassment reports or threatening to report harassment.

Harassment by Nonemployees

Hugo Boss Retail Inc. will also endeavor to protect employees, to the extent possible, from reported harassment by nonemployees in the workplace, including customers, clients and suppliers.

Complaint Procedure and Investigation

Any employee who wishes to report a possible incident of sexual harassment or other unlawful harassment or discrimination should promptly report the matter to their manager, any other member of management, Human Resources or the Anonymous Hotline.

Hugo Boss Retail Inc. will conduct a prompt investigation as confidentially as possible under the circumstances. Employees who raise concerns and make reports in good faith can do so without fear of retaliation; at the same time, employees have an obligation to cooperate with Hugo Boss Retail Inc. in enforcing this policy and investigating and remedying complaints.

Anyone found to have engaged in behavior in violation of this policy will be subject to appropriate discipline, which may include termination. Appropriate action will also be taken to deter any future harassment or discrimination.

Retaliation

Retaliation is illegal and will not be tolerated. Any employee who files a complaint of harassment or other discrimination in good faith will not be adversely affected in terms and conditions of employment and will not be retaliated against or discharged because of the complaint.

In addition, we will not tolerate retaliation against any employee who, in good faith, cooperates in the investigation of a complaint. Anyone who engages in such retaliatory behavior will be subject to appropriate discipline, up to and including termination.

The Equal Employment Opportunity Commission ("EEOC") and equivalent state agencies will accept and investigate charges of unlawful discrimination at no charge to the complaining party. The nearest office of the EEOC and equivalent state agencies can be found.