

Compliance



HUGO BOSS WHISTLEBLOWER POLICY

AT A GLANCE

This chapter is intended to quickly acquaint all HUGO BOSS employees and third parties with the core contents and provisions of the HUGO BOSS WHISTLEBLOWER POLICY:

- I. HUGO BOSS protects all whistleblowers submitting reports in good faith from retaliation or detriment. This means that reprisals such as warnings, suspensions, dismissals, negative performance evaluations etc. that are made in response to a report are not tolerated. HUGO BOSS takes strict action against anyone who takes reprisals.
- II. Protected whistleblowers may include job applicants, employees, former employees, business partners, direct and indirect suppliers and their employees, customers as well as other third parties.
- III. HUGO BOSS whistleblower channels
Reports can be submitted via the HUGO BOSS Speak Up Channel (operated by the Compliance department) or to the HUGO BOSS Ombudsperson. Reports can be submitted electronically via the whistleblower channels, in person, or by phone, email or mail.
- IV. The whistleblower's identity is treated with the utmost confidentiality and is only known to authorized persons.
- V. Anonymous reports can be submitted at any time to the HUGO BOSS Ombudsperson or through the web-based, internal HUGO BOSS whistleblower channel (HUGO BOSS Speak Up Channel).
- VI. The following, in particular, can be reported: criminal and administrative offenses, violations in a wide range of areas (corruption, money laundering, antitrust law, product safety, environmental protection, etc.), human rights violations, including those occurring along the supply chain, as well as violations of the HUGO BOSS Code of Conduct, the HUGO BOSS Supplier Code of Conduct, and internal compliance policies. Even adequate suspicion of a potential violation or wrongdoing is sufficient to submit a report.
- VII. The case manager acknowledges the receipt of the report without delay, but no longer than within 7 days and processes it subsequently. All whistleblowers receive feedback no later than three months after acknowledgement that their report has been received.

Please note that the AT A GLANCE chapter is not intended to be exhaustive and is only meant to provide an overview of the core contents and provisions of this Policy. All specifications and contents of this Policy are binding and must be adhered to by employees.

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INTRODUCTION

1 PURPOSE

HUGO BOSS abides by the law and maintains the highest standards of conduct and integrity. Therefore, we take every disclosure of non-compliance with laws or internal rules and regulations (e.g. policies) seriously and are always interested in investigating and remedying such compliance violations. For this reason, we give all our employees, suppliers, and third parties the opportunity to draw our attention to irregularities within their own sphere of activity or to non-compliance on the part of our Company ("whistleblowing").

Tips are important.
They help us to
reveal misconduct!

HUGO BOSS is aware that whistleblowers may worry about suffering reprisals if they submit a report. This Policy thus grants all whistleblowers extensive protection against disadvantages (see [7 WHISTLEBLOWER PROTECTION](#)).

In addition, this Policy describes our internal processes in a transparent way, to inform all whistleblowers about the process and procedures as thoroughly as possible.¹

2 SCOPE

This Policy applies to employees at all companies and business areas of the HUGO BOSS Group. The Policy must be implemented appropriately² by the responsible bodies in all Group companies. Compliance with the standards set forth below is mandatory for all employees.

Should this Policy conflict with specific national legislation, individual provisions of this Policy may be amended. In such cases, however, the amended provisions may not deviate in their essential content and purpose from the present Group-wide provisions. Such exceptions must be justified and always be agreed with the Central Compliance Department.

Violations of this Policy will not be tolerated and may result in consequences including consequences under labor law.

REGULATIONS

3 WHO CAN BE A WHISTLEBLOWER?

Anyone can be a
whistleblower!

HUGO BOSS defines a whistleblower as any person who observes misconduct, a violation, or illegal activity in connection with HUGO BOSS, or suspects such behavior for concrete reasons, and reports this. In general, this does not include incidents of a private nature. The following groups of persons, in particular, frequently

¹ In this Policy, HUGO BOSS also implements the requirements for procedural rules in accordance with the German Supply Chain Due Diligence Act (LkSG), cf. Section 8 (2) LkSG.

² Upon entry into force of the Policy on Policy Management, the provisions set forth therein must be taken into account.

act as whistleblowers: job applicants, employees, former employees, temporary workers, business partners, direct and indirect suppliers and their employees, customers.

4 WHAT SHOULD BE REPORTED?

Every whistleblower is entitled to report any unlawful act or omission on the part of the Company as well as any unlawful act or omission occurring within its area of activity if such an act or omission is punishable by a criminal penalty or an administrative fine.

This includes, in particular, the following violations³:

- Violations resulting in fines or criminal penalties (such as corruption, fraud, embezzlement, extortion, theft, forgery);
- Violations of provisions serving to prevent money laundering and terrorist financing;
- Violations of product safety and compliance provisions;
- Violations of environmental protection provisions;
- Violations of food safety provisions;
- Violations of animal health and welfare provisions;
- Violations of provisions regulating consumer rights and consumer protection in connection with contracts between traders and consumers;
- Violations of pricing provisions and provisions on dishonest corporate practices;
- Violations of provisions meant to protect privacy and personal data;
- Violations of provisions governing the security of network and information systems;
- Violations of provisions governing the rights of shareholders and stock companies;
- Violations of accounting (including bookkeeping) provisions.

In addition, reports on risks related to human rights and environmental matters, as well as reports on human rights violations and violations related to the following categories may be submitted:

- Violations of occupational safety and health provisions;
- Violation of Conflicts of interest provisions;
- Violations of the HUGO BOSS Code of Conduct, the HUGO BOSS Supplier Code of Conduct or internal HUGO BOSS compliance policies.

The whistleblower does not have to be able to prove the violation or breach at the time of the report. The fact that there could have been a breach is enough to justify making a report. The whistleblower should always submit a report if he or she believes, in good faith, that the information he or she discloses is correct at the time the report is made. This is not the case if the whistleblower is aware that the information reported is untrue. In case of doubt, the whistleblower may still submit a report; but the disclosures should then not be presented as facts, but rather as suspicions, evaluations or as statements by other persons.

The following categories of concerns should not be reported via the HUGO BOSS whistleblower channels, but rather to the responsible departments:

- All questions and concerns related to HUGO BOSS products must be reported to the HUGO BOSS customer service. This also applies to complaints, for instance regarding product quality.

³ The reporting of the violations listed below is explicitly protected by European and national law (in many member states of the European Union).

- Concerns and complaints related to the working environment, to how employees treat one another, and other violations that do not fall under the categories above must be reported to the responsible supervisor, or alternatively to the responsible HR Manager.

In such cases, the Compliance department will inform the whistleblower that his or her case does not qualify as whistleblower report. With written consent from the whistleblower, the Compliance department forwards the case to the responsible HUGO BOSS department. If the whistleblower does not provide his/her written consent, the case will be closed without further action.

5 HOW CAN REPORTS BE SUBMITTED? – STRUCTURE OF THE HUGO BOSS WHISTLEBLOWER SYSTEM

HUGO BOSS offers all potential whistleblowers both internal as well as external channels to submit a report ("whistleblower channels"). The whistleblower channels are treated equally, meaning that all reports are treated the same, regardless of the channel through which they are received. The whistleblower channels are confidential, can be used free of charge and are accessible worldwide.

5.1 Confidentiality & anonymity

Any report – regardless of its veracity – is likely to cause serious damage to the reputation of the person(s) concerned, the whistleblower, third parties, or the Company itself. Accordingly, all reports must be treated with the utmost confidentiality and in compliance with applicable laws. The whistleblower channels of HUGO BOSS generally ensure that the identity of the whistleblower and the identities of any third parties who are the subject of or who are named in the report are kept confidential. Unless the whistleblower expressly consents, the information provided is not disclosed to any other persons besides the authorized employees entitled to receive reports or following up on them. This also applies to all other information that could be used to directly or indirectly determine the identity of the whistleblower. No unauthorized persons will be permitted access to this information.

The identity of the whistleblower is treated with utmost confidentiality!

In certain legally prescribed cases, HUGO BOSS is obligated or entitled to disclose the identity of the whistleblower or other confidential information.

HUGO BOSS offers both its employees and external third parties different ways to make a report:

HUGO BOSS permits all whistleblowers to submit reports without disclosing their own identity ("anonymous reports"). Anonymous reports can be submitted at any time via the internal whistleblower channels (see [5.2 Internal HUGO BOSS whistleblower channels](#)) and external state whistleblower channels (see [5.3 External state whistleblower channels](#)) by HUGO BOSS employees as well as external third parties.

5.2 Internal HUGO BOSS whistleblower channels

HUGO BOSS offers all whistleblowers an internal, web-based whistleblower channel (HUGO BOSS Speak Up Channel), which can be accessed from various end devices. The HUGO BOSS Speak Up Channel is available in multiple languages. Reports received via the HUGO BOSS Speak Up Channel can be submitted anonymously and are processed confidentially and in accordance with the law.



Link to the internal, web-based HUGO BOSS whistleblower channel:

[HUGO BOSS Speak Up Channel](#)

If whistleblowers prefer to make a report in person, the Compliance department is available and can be contacted at any time. The Compliance department accepts reports made in person as well as via phone, mail, or email.

The contact details of the HUGO BOSS Compliance department are as follows:

Dominik Heske
Group Compliance & Human Rights Officer
Phone: + 49 7123 94 83859
Mobile: + 49 160 97 805613
Email: Dominik_Heske@hugoboss.com

Lena Osswald
Compliance Manager
Phone: +49 7123 94 86901
Email: compliance@hugoboss.com

Non-web-based reports to the Compliance department are treated with just as much confidentiality as those made using the other channels. However, reports can only be made anonymously via the HUGO BOSS Speak Up Channel or the HUGO BOSS Ombudsperson.

The HUGO BOSS Ombudsperson, a trusted external lawyer appointed for the entire Group, serves as an additional, neutral whistleblower channel for all whistleblowers. This allows reports to be made in person, by telephone, by mail or email at any time (24/7).

All whistleblowers are free to submit their report in their own native language or in any other language. If reports are submitted in person or by phone, a translator is made available if necessary.

The Ombudsperson treats all reports as confidential. In addition, the Ombudsperson informs each whistleblower that it is possible to not reveal the identity of the whistleblower towards HUGO BOSS.

The contact details of the HUGO BOSS Ombudsperson are as follows:

Dr. Carsten Thiel von Herff
Loebellstraße 4
33602 Bielefeld
Germany
Phone 1: 00800 6628376266 (free call number)
Phone 2: + 49 521 55 7 333 0
Mobile: + 49 151 58 230 321
Email: ombudsman@thielvonherff.com
Electronic system: <https://report-tvh.de/>

5.3 External state whistleblower channels

By providing its internal whistleblower channels, HUGO BOSS has created a protected platform to submit a report. Further information on the internal whistleblower channels is available on the [HUGO BOSS intranet](#) as well as on the [HUGO BOSS Group website](#). In addition to the internal HUGO BOSS whistleblower channels government agencies in the European Union offer external whistleblower systems, which may also be used by whistleblowers.

External state whistleblower systems should primarily be used if the internal reporting office does not remedy the violation, or if the whistleblower suspects that the violation will not be addressed effectively through internal channels, or that he or she may suffer reprisals.

6 HANDLING OF REPORTS / GERMAN SUPPLY CHAIN ACT - RULES OF PROCEDURE

6.1 Responsibility

Acting as internal reporting office, the Compliance Officer, who is independent and not bound by instructions when performing his duties, is the person responsible for establishing, managing and regularly reviewing the effectiveness of the whistleblowing system. The Compliance Officer is supported in his function as internal reporting office by selected employees from the Compliance department ("case managers"). In coordination with the Compliance Officer, the case manager is responsible for investigating the report and involving affected departments, in accordance with the pre-defined processing procedure set forth below. Case managers have the knowledge, training, and experience necessary to carefully review and process cases.

6.2 Acknowledgement of the whistleblower's report & contact

HUGO BOSS will acknowledge receipt of a report without delay, but no later than within 7 days. If possible and expedient, the case manager will discuss the facts of the case with the whistleblower. The acknowledgement and initial discussion will be handled either directly by the case manager or by the HUGO BOSS Ombudsperson. Reports made anonymously can only be acknowledged to the extent it is possible to do so.

6.3 Report management

All reports, regardless of the reporting channel through which they are received, are documented and legally evaluated by the case manager in a central system that keeps the identity of the whistleblower confidential and protected from unauthorized access. Reports submitted orally are documented by the case manager. Upon request, the whistleblower will be given the opportunity to review the documentation of the conversation, correct it if necessary, and confirm the accuracy of the documentation by signing it.

6.4 Preliminary review

Each report is subject to a preliminary review by the case manager.

If the preliminary review finds no indications of a violation pursuant to the section 4 WHAT SHOULD BE REPORTED? of this Policy or if the case manager assesses the report as unfounded, no further action will be taken and therefore the case will not be pursued any further. The case manager documents the results of the review and informs the whistleblower of the results without delay. The case manager is discussing the results of the preliminary review with the Compliance Officer.

If the preliminary review shows that a reportable violation may have occurred, then this must be documented. Any follow-up measures must follow the principle of proportionality (appropriateness of intervention and purpose). This explains why it is not uncommon to only pursue allegations of criminal or serious misconduct.

6.5 Report to the Executive Board

The Compliance Officer informs the responsible board member without delay about all whistleblower reports that are significant for the company.

This is particularly the case when

- the report has or could have a material impact on the company's reputation;
- the report contains allegations against the management or Executive Board of HUGO BOSS AG or of its subsidiaries;
- the report includes damage of more than 25,000 EUR (or a corresponding amount in another currencies) or this is to be expected.

In these cases, the further course of action is discussed in coordination with the responsible board member.

6.6 Investigations

The case manager initiates the necessary investigation activities, which will in each case be concluded with a closing report. During the investigation the case manager is in close coordination with the Compliance Officer. The case manager maintains contact with the whistleblower during the entire investigation. If necessary, the case manager can involve further selected departments (such as HR, Loss Prevention, Legal, Local Compliance Contact) to support the investigation. Employees are obligated to support the investigation. Furthermore, they are obligated to maintain confidentiality in doing so.

The whistleblower receives feedback from the case manager no later than three months after the acknowledgement that his or her report has been received. If the investigations take longer due to special circumstances, the whistleblower will be informed of the expected duration by the case manager.

In general, the presumption of innocence applies, which is why not only incriminating, but also exculpatory evidence is sought.

6.7 Conclusion

If the investigation finds that a punishable violation occurred, the Company (executive board and/or departments involved, e.g. HR) will decide, in close coordination with the case manager and Compliance Officer, if applicable, on the measures or sanctions to be taken. This applies irrespective of the identity of the person who committed the violation or his/her hierarchy level in the company. If necessary, the Compliance Officer submits a proposal regarding the measures or sanctions to be taken to the responsible board member, who will then make a final decision.

Violations are prosecuted regardless of the person involved or their hierarchy level!

The whistleblower will be informed about the conclusion of the investigation.

A comprehensive documentation about the report and investigation is compiled by the case manager.

If the report turns out to be false, or if it cannot be sufficiently proven, this will be documented accordingly, and the proceedings will be halted immediately. The reported person ("subject of the report") may not suffer any consequences and report information will particularly not be documented in the personnel file.

6.8 Special case – misconduct by Compliance department

In case a report concerns potential misconduct by employees of the Compliance department, it is recommended that the report is submitted to the external HUGO BOSS Ombudsperson. The Ombudsperson will report the potential violation directly to the board member responsible for the department. The responsible board member will take the measures necessary to investigate the report.

7 WHISTLEBLOWER PROTECTION

7.1 General information

HUGO BOSS guarantees all whistleblowers protection within its own area of activity. A central component of whistleblower protection is the confidential treatment of the identity of the whistleblower (see [5.1 Confidentiality & anonymity](#)). If the whistleblower provides his or her contact details, these are processed in compliance with data protection regulations.

In general, the name or other information that could be used to identify the whistleblower directly or indirectly are not disclosed. The situation may be different if the whistleblower expressly gives permission for the revealing of his or her identity, if there is a legal obligation to do so, or if the identity

of the whistleblower becomes unavoidably known in some other way (e.g. in the case of employees of indirect suppliers, over whom HUGO BOSS has no direct influence). This also applies, in particular, if the disclosure is essential to ensure that the person who is subject of the report can take advantage of his or her right to a hearing or to defend himself/herself. In such cases, the whistleblower must be informed in advance that his/her identity will be disclosed, provided that doing so does not jeopardize any relevant investigations or court proceedings.

7.2 Protection against reprisals

If a whistleblower acted in good faith, no form of retaliation or discrimination ("reprisals") against the whistleblower for reporting suspected wrongdoing is permissible. This also applies to any threats or attempts to carry out reprisals. HUGO BOSS will not tolerate any infringements of these provisions. Such infringements may for their part be reported in accordance with the requirements of this Policy.

HUGO BOSS will not tolerate reprisals of any kind against whistleblowers due to a report. This, in particular, includes protection against:

- Suspension, termination or comparable measures;
- Demotion, change of work location, reduction in salary, change in work hours;
- Negative performance appraisal or issuing a poor job reference;
- Disciplinary action, reprimands or other sanctions, including financial penalties;
- Coercion, intimidation, bullying or exclusion;
- Discrimination, adverse or unequal treatment;
- Harm (including reputational harm), in particular, on social media, or causing financial losses (including loss of business or revenue);
- Early termination or cancellation of a contract for goods or services;
- Withdrawal of a license or permit.

The Whistleblower protection also applies even if the information provided cannot be substantiated.

However, any abuse of the protection afforded to whistleblowers will not be tolerated.

Whistleblower protection will not be extended to measures which had already been taken or were clearly planned to be taken before the whistleblower made his or her report or that are based on a different set of circumstances. The same applies to reports made solely for the purpose of causing harm. Whistleblowers submitting such reports are not covered by the whistleblower protection and will be sanctioned in clearly provable cases.

8 PROTECTION OF THE PERSONS AFFECTED BY A REPORT

Any person affected by a report will be notified of the allegations against him or her at the appropriate time, considering the requirements of data protection laws. This will occur unless such notification would significantly impede the progress of the proceedings to establish the facts or the implementation of follow-up measures. The person affected in the report will be granted the right to make a position statement on the report during the investigations. The notification will be made, at the latest, after the investigation has been completed or at such time as when the investigation could no longer be jeopardized by doing so.

If a suspicion raised in a report does not prove to be true, the person affected can request that HUGO BOSS delete any data that it has stored in this context.

9 DATA PROTECTION

Personal data will be collected and stored in the course of implementing procedures under this Policy. Personal data is always handled in compliance with applicable data protection laws. Only personal data necessary to carry out the purposes specified in this Policy will be processed.

Applicable retention and deletion periods will be complied with.

All persons whose personal data is processed by HUGO BOSS as outlined in this Policy may exercise their rights to rectify incorrect data, to restrict processing (blockage) or to delete their data, if the relevant legal requirements are met. Furthermore, these persons can also assert their right to data portability at any time or submit a complaint to a supervisory authority regarding any processing of their personal data that does not comply with data protection law. All persons affected also have the right to request information regarding their personal data saved by HUGO BOSS. However, this right does not exist if this would result in information being disclosed which must be kept confidential due to the prevailing legitimate interests of a third party.

If data processing is carried out based on a consent, this can be revoked at any time with future effect (revocation).

Where such objection is based on a legitimate interest, a data subject will also have the right to object at any time to processing of personal data concerning him or her on grounds relating to his or her particular situation (objection to processing).

Any persons involved in the procedure, including the whistleblower himself/herself, can contact the central HUGO BOSS Data Protection Officer at any time (DPO@hugoboss.com) to verify whether applicable data protection provisions were observed, or to assert their aforementioned rights. The Data Protection Officer is legally obligated to HUGO BOSS to maintain confidentiality regarding information shared with him/her by data subjects.

10 EFFECTIVENESS REVIEW

The HUGO BOSS Compliance department checks the effectiveness of the complaint process as needed, and at least once a year. The following indicators are considered to measure effectiveness: (1.) Number of complaints, (2.) Information on the whistleblower (own employees, suppliers, others) and (3.) Feedback received from the whistleblower or other stakeholders regarding the complaint process.

11 APPLICABILITY & UPDATES

This Policy is applicable as of January 01, 2022 (last updated May 5, 2025), and applies without restriction throughout the entire HUGO BOSS Group (see [2 SCOPE](#)).

This Policy can be amended at any time. At least once a year, the Policy is reviewed to ensure it is up to date. Experiences from the past year and suggestions from internal and external stakeholders are

always taken into consideration. The current version of this Policy is available on the company website and the HUGO BOSS Intranet.

12 CONTACT PERSONS

Violations can be reported (anonymously) at any time to the [HUGO BOSS Speak Up Channel](#) or the HUGO BOSS Ombudsperson, [Dr. Carsten Thiel von Herff](#).

In case of questions or remarks employees can contact their own supervisor, the HUGO BOSS Ombudsperson, or the local or central [Compliance department](#).

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2.0	05MAY2025	Compliance Department	Changes to the content in sections 4 WHAT INFORMATION MAY BE SUBMITTED IN A REPORT 6 PROCESSING PROCEDURE / LkSG RULES OF PROCEDURE 9 DATA PROTECTION 11 APPLICABILITY & UPDATES