

COMPLIANCE

HUGO BOSS
CAPITAL MARKETS POLICY

(QR version)

INSIDER TRADING AT A GLANCE

The purpose of this Introduction is to enable all of HUGO BOSS's employees to quickly become acquainted with the core elements and provisions of the *HUGO BOSS CAPITAL MARKETS POLICY*:

- I. *The unauthorized disclosure of inside information is prohibited!*
- II. *Every employee may have access to inside information or may (accidentally) know such information. Therefore every employee bears a high level of responsibility.*
- III. *Inside information is any non-public information which could, if published, lead to a significant change in the HUGO BOSS share price.*
- IV. *Inside information must always be protected. It is essential to prevent unauthorized persons from, even accidentally, overhearing or reading such information.*
- V. *Using inside information for oneself or third parties to gain an advantage in share trading is strictly prohibited ("insider trading"). Even simply giving others tips about buying/selling without disclosing any information is prohibited.*
- VI. *In principle, inside information may not be disclosed. This does not apply to the disclosure of information to authorized persons (e.g. employees and external agents) for whom access to the relevant inside information is essential for their work. Family members, friends etc. must not be entrusted with inside information.*
- VII. *The disclosure of inside information to authorized employees is subject to the consent of the supervisor(s) and an explanation of how inside information must be handled. The disclosure of inside information to authorized externals is subject to strict requirements. Details can be found in the Policy.*
- VIII. *In the event of a (possible) loss of inside information, the Legal Department must be informed immediately.*
- IX. *Blackout periods: No employee (including members of the Managing Board and Supervisory Board) may trade HUGO BOSS shares for him/herself or for third parties 30 calendar days prior to the publication of a quarterly, interim or annual report. This prohibition also extends one calendar day thereafter. HUGO BOSS will announce the publication dates in advance.*
- X. *Illegal insider trading can result in substantial penalties for employees and HUGO BOSS. In addition, reputational damage (i.e. through "naming and shaming") is very likely.*

It should be noted that it is not possible in this introduction to give a complete overview of the topic. All regulations and examples can be found in the guideline that is made available on the HUGO BOSS intranet.