

**COMPLIANCE**

**HUGO BOSS**

**COMPETITION AND ANTITRUST POLICY**

**(QR version)**

## 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 COMPETITION AND ANTITRUST POLICY*:

- I. *HUGO BOSS takes on the challenges posed by a competitive market and does not tolerate any infringements of competition or antitrust law.*
- II. *Agreements or exchanges of information with other companies (horizontal competitors) which are aimed at preventing, restricting or distorting competition are prohibited. These include, but are not limited to, agreements on prices, price components, costs, pricing strategies and price-related factors (e.g. discounts and margins), agreements on minimum, standard and list prices, agreements on price increases and price reductions, agreements on sales, sales increases, profits and losses, contractual terms and standard terms and conditions as well as agreements on the allocation of customers, business partners, markets and sales territories. Such agreements never benefit HUGO BOSS.*
- III. *In dealings with wholesale customers (or companies at another market level), special protection is accorded to the freedom of such companies to establish their own prices. The fixing of resale prices is strictly prohibited (i.e. vertical restraints of competition). It is, however, permissible to set, communicate and explain the reasons for a recommended retail price (RRP). This must always remain non-binding. Exerting pressure or offering incentives to encourage compliance with an RRP is prohibited.*
- IV. *HUGO BOSS's hybrid position – Both of our own distribution channels (Retail & Wholesale) are, from an antitrust law perspective, in competition with each other and must therefore be separated from one another by information barriers (what are known as "Chinese walls"). The disclosure and/or exchange of sensitive data and information (e.g. prices, orders, delivery quantities, margins, discounts and discount periods) between distribution channels is generally prohibited.*
- V. *Employees should be particularly cautious when meeting with competitors. If conversation turns to impermissible topics, follow the STOP - LEAVE - REPORT principle.*
- VI. *In all cases, if you have inadvertently violated any rules, notify Legal or Compliance immediately so that they can respond accordingly. In antitrust law, the following applies: silence is not golden.*
- VII. *Employees are required to assist the cartel authorities if they conduct a search of our premises. Management, Legal, and Compliance must be informed immediately. Employees should not comment on any allegations unless a lawyer is present. No data may be destroyed or deleted.*
- VIII. *Fines of up to 10% of HUGO BOSS's global turnover may be imposed on it for infringements of antitrust law. In addition, it could be exposed to damages claims. Any intentional or negligent violations of antitrust law may result in employees being subject to disciplinary measures or criminal charges.*
- IX. *Seek legal advice in good time. Please contact Legal or Compliance if you have any questions or special issues that you wish to discuss.*

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.