

BESTSECRET

Supplier
Code of Conduct
(SCoC)

AUGUST 2025

TABLE OF CONTENTS

1. Introduction	Page 3
2. Social standards	Page 4
2.1. No forced-labour – Employment is freely chosen	Page 5
2.2. No discrimination in employment	Page 5
2.3. No harassment or abuse	Page 5
2.4. No exploitation of child labour	Page 5
2.5. Freedom of association and the right to collective bargaining	Page 6
2.6. Payment of a minimum wage	Page 6
2.7. No excessive working hours	Page 6
2.8. Safe and healthy working conditions	Page 6
2.9. Fairly traded precious metals and stones	Page 6
3. Environmental standards and animal welfare	Page 8
3.1. Environmental and climate protection	Page 9
3.2. Chemical management	Page 9
3.3. Endangered species (CITES)	Page 10
3.4. Animal welfare	Page 11
4. Ethical business practices and integrity	Page 12
4.1. Corruption, trade control, and money laundering	Page 13
4.2. Fair Competition	Page 13
4.3. Personal data, protection of confidential information, and intellectual property	Page 13
5. Product compliance	Page 14
6. Compliance in the value chain	Page 16

1. INTRODUCTION

BESTSECRET is committed to environmentally and socially responsible corporate management. Respectful cooperation in a partnership as well as conscious perception of social responsibility form the basis for long-term corporate success. Among our business partners, we expect that the principles of ecological, social, and ethical behaviour will be observed and integrated into their corporate culture. Furthermore, we expect that they will continuously optimize their business activities in terms of sustainability.

Our Business Partner Code of Conduct lays out these values in the form of ethical ideals and principles that are binding for all our business partners worldwide. It draws from the ideas set out in the 'Declaration of Principles on Respect for Human Rights'. These principles are based on national laws and regulations, such as the Supply Chain Due Diligence Act (SCDDA) as well as international conventions, including the International Bill of Human Rights, Children's Rights and Business Principles, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the standards of the International Labour Organization.

To whom does our Supplier Code of Conduct apply?

Our Supplier Code of Conduct applies to all our business partners – including suppliers, service providers, dealers, consultants, and agents of BESTSECRET. Furthermore, we encourage our business partners to take additional actions to improve the conditions in their own value chains that honour the principles set forth in this Supplier Code of Conduct.

Our business partners must comply with all legal requirements relevant to the products and/or services that we retain from them as well as to the conduct of their businesses as such and must adopt and follow practices which safeguard human rights, workers' employment rights, safety, and the environment. Business partners must ensure that the products and/or services that we retain comply with the applicable legal requirements in all BESTSECRET sales territories (i.e., the EU and Switzerland). BESTSECRET reserves the right to reject products failing to meet any requirement of the applicable law.

A full-body photograph of a Black man standing on a beach. He is wearing a long, dark blue coat over a black turtleneck and black trousers. He is looking directly at the camera. The background shows the ocean with waves and a sunset sky. The foreground is a sandy beach with some seaweed.

2. Social Standards

BESTSECRET

FOLLOWING THE ILO

INTERNATIONAL LABOUR ORGANIZATION

The International Labour Organization (ILO) defines labour standards and rights that aim to achieve decent and humane working conditions, as well as to encourage social equity. They are based on international standard labour practices. ILO Conventions set practical guidelines for public authorities, employers, employees, enterprises, and organisations. Their stated social standards for suppliers focus on specific economic sectors and address issues, hazards, and health/safety measures that we request our business partners comply with:

2.1. No forced-labour – Employment is freely chosen

We do not accept any form of forced labour or work enforced by deception, intimidation, or coercion. All workers must be allowed to satisfy their basic human needs (such as going to the toilet or drinking a glass of water) during working hours. Workers must be able to terminate their employment at any time in accordance with the applicable law. We also expect that only migrant workers with a valid work permit will be employed. Workers must not be unlawfully denied access to their own identity and residence documents (ILO Conventions 29 and 105).

2.2. No discrimination in employment

Recruitment, wage policy, admittance to training programs, employee promotion policy, policies of employment termination, retirement, and any other aspect of the employment relationship shall be based on the principle of equal opportunities, regardless of race, colour, sex, religion, political affiliation, union membership, nationality, social origin, deficiencies, or handicaps (ILO Conventions 100 and 111).

2.3. No harassment or abuse

Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse (ILO Convention 190).

2.4. No exploitation of child labour

Any kind of child labour is strictly prohibited. The age for admission to employment shall not be less than the age of completion of compulsory schooling and, in any case, not less than 15 years (ILO Convention 138). There shall be no forms of slavery or practices like slavery, such as the sale or trafficking of children. Children (at the age of 15 – 18) shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety, or morals (ILO Convention 182).

2.5. Freedom of association and the right to collective bargaining

The right of all workers to form and join trade unions and bargain collectively shall be recognised (ILO Convention 87 and 98). Each business partner shall, in those situations in which the right to freedom of association and collective bargaining are restricted under law, facilitate parallel means of independent and free association and bargaining for all workers. Workers' representatives shall not be subject to discrimination and shall have access to all workplaces necessary to carry out their representation functions (ILO Conventions 135 and 143).

2.6. Payment of a minimum wage

Wages and payments for a standard working week shall meet at least legal or industry minimum standards and always be sufficient to meet the basic needs of workers and their families and to provide some discretionary income (ILO Conventions 26 and 131). Employees shall be adequately and clearly informed about the specifications of their wages including wage rates and pay periods.

2.7. No excessive working hours

Hours of work shall comply with applicable laws and industry standards. In any case, workers shall not be required on a regular

basis to work more than 48 hours per week and shall be provided with at least one day off for every seven-day period. Overtime shall be voluntary and shall always be compensated at a premium rate. Moreover, public and religious holidays should be respected (ILO Convention 1).

2.8. Safe and healthy working conditions

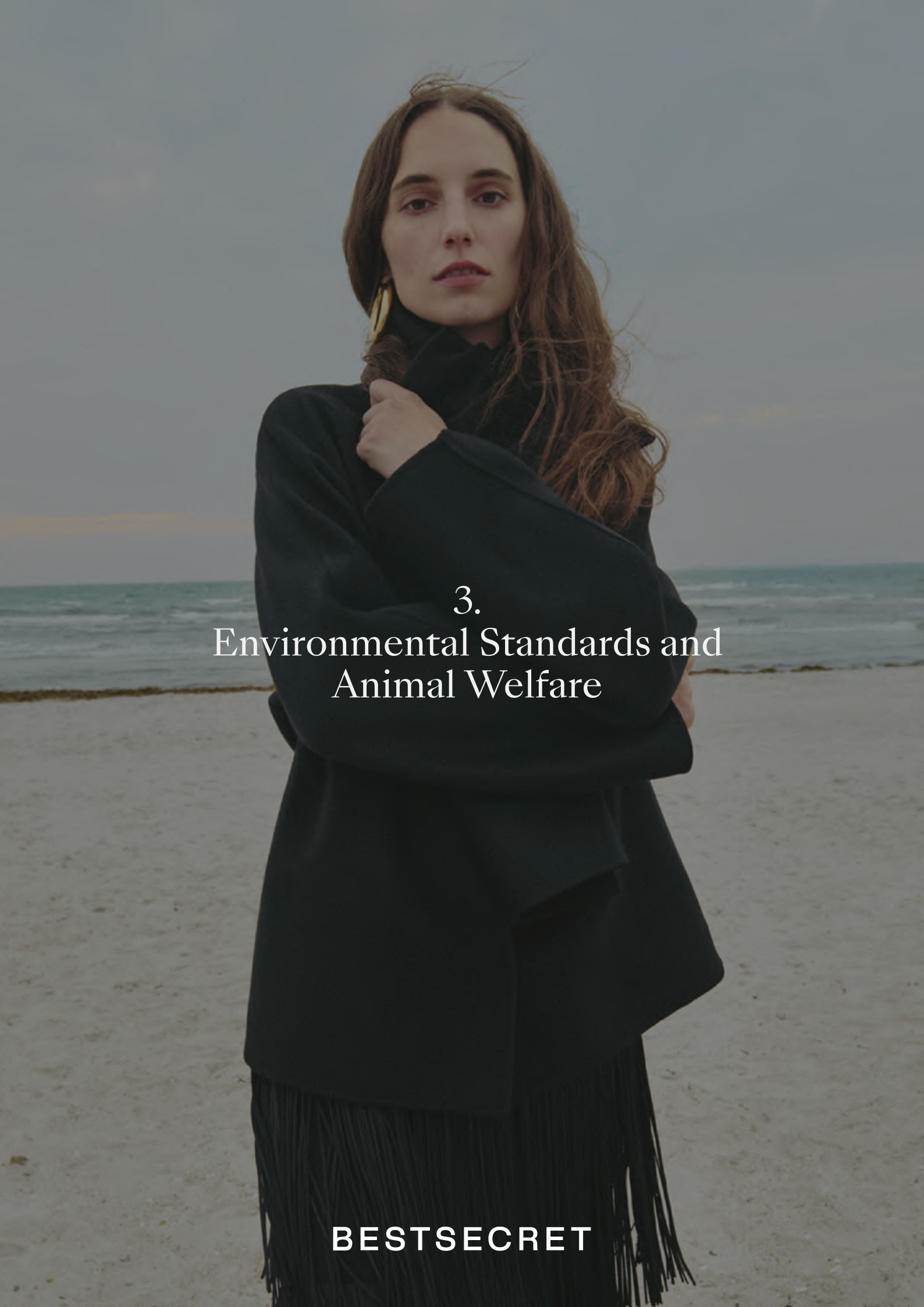
A safe and hygienic working environment shall be provided, and best occupational health and safety practice shall be promoted, bearing in mind the prevailing knowledge of the industry and any specific hazards. Effective regulations shall be implemented to prevent accidents and minimise health risks as much as possible (ILO Convention 155).

2.9. Fairly traded precious metals and stones

In recent years, there has been more public awareness of bad working conditions and basic human rights abuses in the mining of gold, diamonds, and other precious metals and stones. Our business partners must take appropriate measures to ensure that the minerals and metals used in their production and products do not directly or indirectly contribute to conflicts in countries that are highly affected by the operations of the mining industry. The business partner must ensure and shall, upon BESTSECRET's request, demonstrate that measures have been taken to promote the fair mining of metals and stones. Furthermore, the busi-

ness partner shall avoid the use of conflict minerals as defined by the EU Conflict Minerals Regulation ((EU) 2017/821), especially regarding the following minerals:

- Columbite-tantalite (coltan)
- Cassiterite
- Gold
- Wolframite
- Or any of their derivatives mined in the Democratic Republic of the Congo or a neighbouring country.

A woman with long brown hair and large gold hoop earrings stands on a sandy beach. She is wearing a black, long-sleeved coat with a high collar and a long fringe at the bottom. Her arms are crossed, and she is looking directly at the camera. The background shows the ocean and a cloudy sky.

3. Environmental Standards and Animal Welfare

BESTSECRET

3.1. Environmental and climate protection

Ecosystems provide us with natural resources, such as clean air and water, which are essential to people, communities, and businesses. To meet the needs of present and future generations, the long-term health of ecosystems must be protected by preventing harm to the environment and by using natural resources responsibly. BESTSECRET believes that maintaining a safe and healthy environment is the obligation of every citizen and every enterprise. Business partners shall fulfil their environmental responsibilities by complying with applicable legal requirements and recognised standards for the protection of the environment and climate and by making efforts to continuously improve the impact of their business activities on the environment and climate. Business partners shall specifically avoid having negative impacts on and causing risks to local communities while respecting their rights to clean water, air, and soil. They shall act responsibly and ensure that their activities do not have a negative impact on the local environment and the people living there.

Business partners shall conduct operations in compliance with all applicable laws and regulations and shall at all times maintain relevant valid permits in the following areas:

- Air quality and air emissions
- Energy efficiency and climate protection

- Water conservation and water quality
- The use and disposal of chemical substances
- Waste: Waste should be collected separately for reuse and recycling; all hazardous waste must be handled by an authorised company or licensed receiver.
- Biodiversity and the protection of species

3.2. Chemical management

All business partners are required to implement a robust chemical management system and due diligence testing to ensure compliance with all relevant EU standards and legislation, in particular, but not limited to, those further detailed below.

In addition to the routine testing carried out by the business partners, BESTSECRET reserves the right to independently test random products as a part of its due diligence programme. Failure to meet EU standards will not be accepted and may, in certain cases, lead to the business partner being delisted and/or being held liable for any damages incurred by BESTSECRET due to the delivery of the non-compliant product by the business partner.

The REACH Regulations (EC) 1907/2206

REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals) is an EU regulation aimed at improving the protection of human health and the environment from hazardous chemicals.¹

Business partners are obliged to operate in compliance with the commitments established by the latest update of the REACH Regulation as stated above.

Products supplied to BESTSECRET must comply with the legally prescribed substance bans and restrictions from Annex XVII of the REACH Regulation.

Products supplied to BESTSECRET must comply with legally prescribed substance restrictions and corresponding authorisation from Annex XIV, including the candidate List of SVHC.

Business partners must immediately inform BESTSECRET of any products supplied to BESTSECRET containing one or more of the substances on the Candidate List of SVHC with concentrations over the threshold of 0.1% weight/weight. POP-Regulation (EU) 2019/1021

POP Regulation (EU) 2019/1021

The aim of Regulation (EU) 2019/1021, also known as the POP Regulation (Persistent Organic Pollutants Regulation), is to protect human health and the environment from the risks posed by persistent organic pollutants (POPs).

Products supplied to BESTSECRET must not contain any POPs above the concentration limits set out in Regulation (EU) 2019/1021, or any amendments thereto.

Additional requirements on use of chemicals for Textile and Footwear products: AFIRM RSL

BESTSECRET is committed to supporting the guidance provided by the AFIRM Group on chemical management for the textile, apparel, and footwear industries. BESTSECRET encourages business partners to continually enhance their chemical management practices in both their products and supply chains.

The AFIRM Group, along with its Restricted Substances List (RSL), is integral to broader sustainability initiatives within these sectors. The AFIRM RSL serves as a critical tool for supply chain stakeholders, helping to reduce environmental impact by minimizing the use of harmful substances. For the latest updates on the AFIRM RSL, please refer to the following link: [AFIRM Restricted Substances List \(RSL\)](#)

3.3. Endangered species (CITES)

Business partners shall follow the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). CITES aims to ensure that international trade in specimens of wild animals and plants does not threaten their survival. It accords varying degrees of protection to more than 30,000 species of animals and

¹ Regulation (EC) 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) dated 23 January 2024.

plants. Business partners are requested to consult this link: [The CITES species | CITES](#) to find out whether their products are covered by CITES.

At the EU Export Helpdesk, business partners will find detailed information on CITES legislation and links indicating whether CITES is relevant to them. Specimens of species listed in Appendices A and B of the EU Endangered Species Regulation are subject to an EU-wide uniform marketing ban (Art. 8 Regulation (EC) 338/97).

3.4. Animal welfare

BESTSECRET will not accept products fully or partly made of:

- Real fur* – being the fur of mammals except for domesticated animals such as horses, cows, pigs, sheep, goats, llamas, and alpacas. We will only purchase products made from domesticated animal materials that are byproducts of the meat industry and not only slaughtered for fashion purposes.
- Exotic leather, such as snake or crocodile.
- Leather that does not solely originate from animals used for meat production.
- Angora wool – made of angora
- Mohair – made of mohair
- Wool that originates from sheep which have been subject to mulesing.
- Down and feather that has been plucked from live birds or birds that have been force-fed.

*What we don't mean with fur and will accept:

- An animal coat that has been clipped off, shorn off, or combed out; fleece, sheepskin, shearling
- Synthetic materials or natural fibres that look like real fur (fake fur)

4.
Ethical Business
Practices and
Integrity

BESTSECRET

4.1. Corruption, trade control, and money laundering

We expect our business partners to reject any form of bribery and corruption and act in accordance with applicable import and export control regulations, as well as comply with the legal requirements for the prevention of money laundering.

4.2. Fair competition

We expect our business partners to advocate free and fair competition, not to tolerate anti-competitive agreements, and to ensure that they act in accordance with applicable antitrust laws. Furthermore, we expect that they will reject competitive advantages through unfair business practices.

4.3. Personal data, protection of confidential information, and intellectual property

Our business partners must respect the privacy rights of their employees and suppliers and comply with applicable legal and regulatory requirements regarding the processing of personal data and security of information when handling personal information.

We expect our business partners to carefully protect the trade secrets and other confidential information entrusted to us from unauthorised acquisition, use, and disclosure – at least in accordance with the relevant legal provisions on the protection of trade secrets.

A woman with long brown hair is standing in a field of tall, dry grass. She is wearing a black coat and a black scarf with white polka dots. Her hair is blowing in the wind. The background is a hazy, overcast sky.

5. Product Compliance

BESTSECRET

Product Safety

We expect our business partners to have taken appropriate measures to ensure the safety and quality of the products sold to BESTSECRET. In doing so, our business partners must ensure that the products comply with the relevant EU and national statutory consumer protection and product safety provisions, including but not exclusively:

- EU GPSR General Product Safety Regulation EU 2023/988
- REACH Regulation (EC) No 1907/2006 including SVHC, Annex XIV and XVII
- POP Regulation (EU) 2019/1021
- Regulation (EU) No 528/2012 - Biocides in Textiles
- Germany only - Chemikalien-Verbotsverordnung (ChemVerbotsV)
- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)
- EU Conflict Minerals Regulation is Regulation (EU) 2017/821
- Annex A of the Minamata Convention on Mercury

The portal for European Union law can be found at: <https://eur-lex.europa.eu/>.

A full-page background image featuring a man with dark skin and short hair, looking off to the side. He is wearing a light beige, belted trench coat over a dark brown turtleneck sweater. He is holding a matching beige hat under his left arm. The setting is a sandy beach with the ocean and a cloudy sky in the background.

6. Compliance in the Value Chain

BESTSECRET

We at BESTSECRET are dedicated to continuously improving our performance regarding labour, workplace conditions, and environmental issues in our supply chain. We aim to engage in business only with companies that meet our standards for ethical operations and comply with the applicable laws and regulations for labour, workplace conditions, and environmental compliance. We reserve the right to conduct our own due diligence and audits to help business partners comply with industry standards, regulations, and our expectations with regards to health and safety, as well as our environmental and social responsibility. We, as BESTSECRET, use the results of audits to drive continuous improvement and to derive strategic business partner development plans.

You will find our policy statement on human rights-related risks and environmental expectations for our own employees and business partners [here](#).

BESTSECRET employees, customers, business partners, workers in the value chain, and any other third party can use our whistleblower system to report violations of compliance requirements and of actual or potential risks to human rights or the environment, irrespective of whether they concern our own operations or our value chain. The electronic whistleblower system can be accessed via the following link: <https://whistleblowing.bestsecret.com>.

Name, Date

Signature, Company Stamp

BESTSECRET