

Code of Ethics

At Blue Seven, we are proud of our values, and aim to embed these in the ethical principles of our employees. In order to maintain the highest level of business ethics and personal integrity, we have formulated Blue Seven's Code of Ethics. The document sets out our expectations regarding the ethical conducts of our employees. Furthermore, it sets forth binding guidelines made to help everyone at Blue Seven understand what is expected of us, what acceptable behavior is, and what is not. This way, we hope to further develop Blue Seven as a company known for great people, strong performance, and high ethical standards.

Thank you for being a part of Blue Seven.

1. Bribery

- 1) We do not accept bribery or corruption of any kind to offer or obtain unjustified advantages or opportunities. Bribery covers cash payments, gifts of inappropriate value, donations, sponsorships, corporate hospitality, personal services, loans, and facilitation payments. We do not bribe employees, neither in the public nor in the private sector, nor is it accepted that we as Blue Seven colleagues receive bribes.

2. Facilitation Payments

- 1) We do not accept facilitation payments. Facilitation payments are a type of bribery that intends to secure or accelerate an action to which the payer is legally or otherwise entitled. For example, facilitation payments could lead to faster approval of an application, faster connection to electricity or a telephone line, or faster expedition at airports and border crossings.
- 2) As a general rule, we do not accept or offer gifts or money. We only accept and offer gifts of limited value in situations where it is common practice to exchange small gifts, for example, in connection with business trips, supplier visits, and national holidays. The value of the gift should always follow local customs and must not exceed EUR 200 (retail price). Accepting and offering gifts must not violate any local laws and must not affect our judgment or independence.

BLUE SEVEN

3) Corporate hospitality is directly associated with doing business and is therefore accepted within reason. Corporate hospitality must always be reasonable in relation to the existing business relationship and must not affect our independence. Corporate hospitality differs from gifts in the sense that it relates to restaurant visits and/or entertainment of customers and other business relations. Corporate hospitality covers banquets, concerts, cinema nights, sporting events, etc. Both entertainment and restaurant visits can take place as an isolated event or in relation to business trips, meetings, or the like.

3. Conflicts of Interest & Preferential Treatment

1) We avoid involvement in activities or agreements which are - or may be - a conflict of interest. We should at all times avoid situations - actual or potential - which may compromise our integrity and put the interests and reputation of Blue Seven at risk. We do not enter into business relations with - or provide benefits to - ourselves, friends, relatives, boyfriends, girlfriends, members of our household, or immediate family without prior approval from our direct manager. Such agreements must be legal and commercially profitable for Blue Seven.

2) We do not misuse or pass on confidential information to anyone outside Blue Seven, and we do not use this information for personal gain. We do not share personal passwords that allow access to Blue Seven's data, systems, or intranet. Confidential information covers financial reports or plans and information regarding the overall business, expansion plans, organizational plans, customers, business partners, suppliers, etc. Confidential information also covers any information that colleagues, suppliers, partners, or customers have entrusted to Blue Seven. We have a data privacy policy in place which is based on the European General Data Protection Regulation.

4. Human Rights & Discrimination

1) General Policy

We support and respect internationally recognized human rights and show a high level of cultural awareness and respect. We do not harass or discriminate on the basis of race, gender, religion, sexual orientation, class, or appearance, and we do not promote a certain group or individuals at the expense of others.

2) Human Rights Due Diligence

Our company has implemented a comprehensive Human Rights Policy that extends its coverage to our own operations and our entire value. We conduct thorough assessments to identify potential human rights risks within our operations and across our value chain, which are based on third party assessments of amfori BSCI. We also provide compliance with human rights and ethical principles for environmental and social concerns through GOTS. We will be certified in mid 2024.

The collaborative approach with amfori BSCI acts to maintain a multi-stakeholder initiative to facilitate progress in addressing human rights risks and opportunities in the workplace. The risk assessment carried out by the Corporate Social Responsibility Manager of Blue Seven tackles issues such as low representation of employees and workers with disabilities and mental health issues.

5. Employment Laws and Standards

1) Policy

We maintain high employment standards at Blue Seven, as we comply strictly with the applicable German Civil Law concerning labor rights. German Labor Law is highly developed and covers terms such as: pay, working hours, terms of employment, parental leave (maternity and/ or paternity leave), annual leave (holiday), paid leave for sickness, dismissal procedure, grievance, safeguarding of healthy and respectful work environment, protection from harassment and bullying, protection of young workers (aged 16-18), discrimination of age, gender, race and inclusivity of all Blue Seven employees and partners.

2) Source of Laws and Standards

The above rights are included in the individual labor contracts of the respective employees and workers of Blue Seven and are based on the Civil Code Bürgerliches Gesetzbuch (BGB), of the Federal Republic of Germany. Furthermore, it is noteworthy that German Civil Law implements EU standards of labor and regulations concerning rights of workers and employees. Through compliance with the aforementioned, employment standards are maintained at the highest of levels possible to Blue Seven.

Besides compliance with above, we have policies in place to address labor risks beyond the law, in order to maintain a safe, fair and decent working environment. We are committed to maintaining diversity, strengthening employees' voices,

BLUE SEVEN

ensuring freedom of association, and cultivating career development and work stability.

We also provide our employees and workers the opportunity for addressing skill gaps and respective training needs. In terms of fair and equitable business practices, the right to enquire about training is guaranteed at Blue Seven. This enquiry is directed at Blue Seven's CEO and at Blue Seven's CSR Manager.

3) Compliance with Labor Laws in States of Production

To comply with equitable treatment of workers in states of production, which include Bangladesh, India, Pakistan and China, we work in tight cooperation with our partner amfori BSCI to monitor and assess human and labor rights risk assessments in the respective states to maintain our high standards. Regular visits of production sights and communication with heads of production ensure that workers standards are directly and personally monitored by employees of Blue Seven as well.

4) Employee Feedback

The CSR Management of Blue Seven gatekeeps the satisfaction of the brands employees and workers in tier 1. This is conducted in a regular time frame throughout the year and contains anonymous feedback questions in which employees of Blue Seven can express their needs, wishes and give feedback in an anonymous way. CSR Management follows this via active engagement with employees and workers after the evaluation of the feedback. This feedback is conducted via Lama Poll. Please see the information at the end of the following guidebook, for further information.

6. Fair and Equitable Recruitment

- 1) Blue Seven is deeply committed to fair and equitable recruitment practices that reflect our dedication to diversity and inclusion. When recruiting externally, we aim to attract a wide range of talent, with a strong focus on including groups that are currently underrepresented within our workforce. By actively seeking diversity in our recruitment efforts, we not only enrich our workplace culture but also foster an environment that embraces different perspectives, backgrounds, and experiences. Our commitment to fair and equitable recruitment aligns with our core values and contributes to a workforce that represents the diversity of our global community.
- 2) We consider the unique position of women in our recruitment and do not discriminate against women. We promote the employment of women.

7. Freedom of Association

- 1) We firmly believe in safeguarding our employees' rights to freedom of association and collective bargaining. Through open and constructive dialogue, we actively engage with our workforce ensuring their voices are heard, concerns addressed, and rights preserved. This commitment aligns with our core values of respect, fairness, and inclusivity. By upholding these principles, we reinforce Blue Seven's reputation as a responsible and ethical employer in the global clothing market.

8. Risk Assessment in the Value Chain

- 1) In order to maintain the above values and reduce risks of violation, especially in the value chain, we work in accordance and with the 3rd party: amfori BSCI. The Risk Assessments are conducted yearly and updated as needed by Blue Seven's CSR Manager.

9. Responsible Marketing Activities

- 1) We have a formal mechanism in place to systematically measure and monitor the responsibility of our marketing activities, which is thoroughly conducted by Blue Seven's CSR Manager.

10. Non-Violation of Commercial Rights

- 1) We do not violate or misuse others' commercial rights. We do not unlawfully copy or make close imitations of designs, photos, drawings, or trademarks that do not belong to Blue Seven.

11. Competition Law

- 1) We compete on fair terms and comply with the competition laws of all countries where we conduct business. The brand Blue Seven is trademarked and enjoys full protection of laws governing intangible property.

12. Product Safety

- 1) Within the framework of Blue Seven's Code of Ethics, our company places a paramount emphasis on safety and the well-being of our customers. As part of our commitment to ethical conduct, we diligently conduct safety risk assessments for our products. These assessments are an essential aspect of our responsible business practices, ensuring that our products meet the highest safety standards. By proactively identifying and addressing potential risks associated with our products, we prioritize the safety and satisfaction of our customers. This practice aligns with

BLUE SEVEN

our dedication to maintaining the highest ethical and quality standards in all aspects of our operations, reinforcing our position as a trusted and responsible brand in the international clothing market.

13. Product Inclusivity

- 1) Blue Seven measures and monitors the accessibility and inclusivity of its products and services. This ensures that they are available and suitable for diverse customer groups. CSR Management is included in meetings with Blue Seven's Management and monitors product inclusivity. The engagement is documented and updated as needed.
- 2) Blue Seven ensures that its on-product environmental and/or social claims are aligned with the latest and most relevant regulations, guidelines, or voluntary codes. This practice ensures accurate and responsible communication.

COMPLIANCE

The above guidelines apply to all Blue Seven colleagues. Managers as well as employees are responsible for avoiding situations of non-compliance. Any violation of our Code of Ethics may have consequences, such as termination of employment, dismissal, or legal proceedings. For any questions regarding our Code of Ethics, including Blue Seven's Compliance program on anti-corruption and competition law, please contact Blue Seven Corporate Compliance. Furthermore, we have formulated a Code of Business Ethics targeted at our suppliers and partners, which can be obtained from Corporate Compliance. Our company has established comprehensive corporate policies and equivalent corporate statements that explicitly recognize our unwavering commitment to managing our business in strict accordance with local, national, and international corporate governance regulations and best practices.

If you suspect or have knowledge of serious misconduct, you are encouraged to speak up at: v.rohrbach@blueseven.com

BLUE SEVEN

Q&A:

For all queries concerning our Business Policies, we refer to the following contacts:

Hannah Burger (CSR) - h.burger@blueseven.com

Viktoria Rohrbach (CSR Manager) - v.rohrbach@blueseven.com

Andreas Burger (CEO) - burger@blueseven.com

Employees surveys are conducted via [Lama Poll](#) yearly.

Our [Data Protection Policy](#) is outlined separately.

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