



# **CODE OF CONDUCT**

Version 4 (09/2022) - English

## Mission Statement – Management Preamble

*Our LOWA Code of Conduct is a guideline for what we do every day.*

No matter whether you simply enjoy nature and spend your leisure hours outdoors, in meadows, forests, and mountains: LOWA is at your side – from outdoor adventures small and large to sophisticated, challenging expeditions. Reliable and aware of its responsibility.

As a mountaineering brand, LOWA lives with and from nature – and consequently intends to offer its customers the best possible outdoor experience with its products. Few sectors are linked so closely to nature as the outdoor industry. For us, this goes hand in hand with responsibility. High-quality materials are expected to meet exceptionally demanding requirements to be durable and robust. At the same time, they should not be harmful to health or the environment. This applies not only to the end product. Production conditions must be fair and eco-friendly. This is why we rely on high environmental and social standards when producing our products and orientate ourselves on internationally applicable standards and agreements that safeguard and guarantee human, environmental and labour rights around the world.

Our commitment to fair working conditions along our entire supply chain is closely linked to our company culture. The shoe industry, in particular, requires a great deal of know-how, skillfulness and – even in the 21st century – manual work. Without the commitment of our more than 2,100 employees, the 100-year success story of our company would simply not be possible. These employees are, after all, the people who manufacture our products and advise our customers. They are our greatest asset.

At LOWA, we practise loyalty, integrity, trust, honesty, and respect. These values guide us as LOWA's management team in our daily interactions with our employees and our customers. But, of course, they apply not only to us, but also to our employees, business partners and producers, both inside and outside Germany.

This Code of Conduct lays down our ethical, environmental, and social standards in detail. These standards apply to our own and partners' production sites in Germany and abroad. We also expect our business partners to rigorously uphold these standards of conduct.

We look forward to continuing a good and cooperative partnership and are happy to help our business partners to implement this Code of Conduct.



Alexander Nicolai

Geschäftsführer / CEO

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## **I. LOWA standards and philosophy**

LOWA Sportschuhe GmbH is a leading German manufacturer of outdoor and hiking footwear. The company is a subsidiary of the Italian Tecnica Group, a leading sports equipment manufacturer in the market of footwear and winter sports equipment.

LOWA is aware of its special responsibility towards employees, customers, the environment and society. Social, environmental, and economic aspects are considered equally and are incorporated into a comprehensive Strategy. Corporate Responsibility (CR) is part of our company philosophy. This CR-Strategy is complemented by a Management-concept to adequately encounter risks in the supply chain and derive continuous improvement potential. For implementing the LOWA standards and philosophy throughout our supply chain, we have developed this Code of Conduct.

Our strategy is also embedded in the commitment of Tecnica Group, our parent company. Tecnica Group is a signatory of the UN Global Compact and has committed itself to the Sustainable Development Goals set by the United Nations.

We base our actions on the provisions of this Code of Conduct, and we expect our employees and business partners to do likewise.

LOWA's Code of Conduct is based on international standards. These include in particular:

- The UN Universal Declaration of Human Rights
- The Ten Principles of the UN Global Compact
- International Labour Organization (ILO) Conventions and Recommendations, in particular "fundamental" Conventions
- OECD Guidelines for multinational companies
- The UN Convention on the Rights of the Child (OHCHR)
- The UN Convention Against Corruption (UNODC)
- The Rio Declaration on Environment and Development

Beyond, all applicable legal regulations (e.g., environmental protection laws) apply. In this context, the most stringent requirement available should be applied.

These standards apply to employees of LOWA Sportschuhe GmbH in Germany and to our subsidiaries (LOWA R&D S.r.l., LOWA Production s.r.o., LOWA Boots LLC, LOWA Schuhe AG, Schöffel-LOWA Stores GmbH) located outside and in Germany as well as to all business partners of LOWA Sportschuhe GmbH.

LOWA accepts a company as a business partner only if she or he pledges to observe the social, environmental and governance standards listed and therefore signs the Code of Conduct.

### **Complaint procedures:**

We have set up our own anonymous complaint management system which can be used to report violations of the requirements laid down in this Code of Conduct. We take all reports submitted seriously and will respond in a timely manner.

The complaint procedures are described in detail in Section V.

## **II. Social Responsibility**

### **Human rights and labour standards**

We observe and respect the UN Universal Declaration of Human Rights, a document that grants the rights of freedom and autonomy to every individual, regardless of age, gender, or origin. We work within our own sphere of influence to ensure that these rights are observed and protected by our own company and by our business partners.

We focus in particular on the compliance with labour and social standards defined by the International Labour Organisation (ILO) and on compliance with the ILO Core Conventions (Declaration on Fundamental Principles and Rights at Work) as well as the respective local labour laws applying for our business partners.

Our standards related to human, labour and environmental rights, as well as to the prevention of corruption, are based on the 10 principles of the UN Global Compact.

We strive to best remedy any violation that occurs within our sphere of influence. For this purpose, we have set up a complaint and whistleblower system to which violations of human and environmental rights as well as breaches of the ethical standards contained in this Code of Conduct can be reported.

### **Employment and fair labour conditions**

We at LOWA stand for fair labour conditions and expect our business partners to do likewise.

We treat our employees with respect. We reject every form of unlawful punishment, abuse, harassment, intimidation or other disrespectful treatment of employees.

We comply with the labour laws that apply in individual countries as part of all our employment relationships and expect our business partners to do likewise.

In particular, the following principles of our Code of Conduct apply in terms of Social Responsibility:

#### **(1) No child labour**

Child labour is prohibited under the principles of the United Nations and ILO. Every form of child labour is impermissible. The rights of children must be protected.

The minimum age of employees should be 16. At the very least, the employment age should not fall below the compulsory school age or the age of 15. The minimum employment age for adolescents may be even higher as a result of laws that apply in particular countries, and in that case, the national legislation shall apply.

Adolescents between the ages of 15 and 18 are not allowed to perform jobs that could pose a threat to their health, safety, or sexual integrity.

Adolescents under the age of 18 may not be assigned to night shifts or work more than eight hours a day. A continuous night-time rest period of at least 12 hours must be guaranteed.

Should business partners determine that a violation of the ban on child labour has occurred in their area of responsibility, they must develop a solution whose overriding concern is the child's well-being.

## **(2) Ban on forced labour and arbitrary disciplinary measures**

Employees must perform their jobs voluntarily and without pressure. LOWA products may not be produced by any form of forced, slave or prisoner labour.

Employees must be treated with dignity and respect. The application of physical, psychological, sexual, or verbal harassment and all other forms of intimidation are prohibited.

Employees who submit a report or complaint based on the Code of Conduct and/or an international or national law may not be subjected to any form of retaliatory or disciplinary measures. No employee may be dismissed as a result of a complaint or whistleblowing report that he or she submitted.

The seizure of passports, for instance as a disciplinary measure, is strictly prohibited.

### **Exclusion of materials and products from Xinjiang, China**

LOWA does not obtain any materials and products from Xinjiang and requires its business partners to review and ensure this demand.

## **(3) Working hours**

National laws governing working hours shall apply. Regular working hours may not exceed 48 hours a week and 12 hours of overtime a week.

Overtime must only be provided on a voluntary basis, it may not be performed regularly or be planned. Employees must receive extra payment for the overtime hours performed.

All employees must be guaranteed at least one day off each week.

Working hours should be posted in highly visible places and should be readily available to all employees.

## **(4) Remuneration**

The remuneration received by all employees should equal the minimum wage that is required by law or is normally paid in the industry, whichever is higher. Business partners are required to pay wages that cover the cost of living and provide an amount of disposable income to employees, should the legal minimum wage be too low to enable this. Wages should be paid regularly and punctually.

Overtime hours are to be compensated with extra pay according to legal or industry standard, whichever is higher.

Employees have the right to receive regular payment, and all statutorily required social benefits (including sick pay, paid holidays, paid maternity leave and parental leave) and to be provided with regular pay slips. These slips should include clear information about the

composition of the remuneration, including deductions and extra pay. Wages may not be deducted as a disciplinary measure.

### **No wage discrimination**

Hiring and remuneration policies, access to advanced training, career opportunities, policies governing the termination of employment relationships and retirement, or any other aspect of an employment relationship should be based on the principle of equal rights and opportunity regardless of an individual's age, gender, religion, political convictions, union membership, social origin, sexual identity and orientation, or disability.

LOWA applies the principle of wage equality. All employees shall receive the same remuneration for the same type of work.

LOWA reserves the right to review its business partners' compliance with this principle in the interests of gender equality.

## **(5) No discrimination**

We treat our employees with respect and dignity. We integrate and include employees into the company without drawing any distinctions between them. LOWA tolerates absolutely no form of discrimination. We protect employees from harassment and unequal treatment.

Our business partners are also encouraged to actively fight discrimination and provide the best-possible protection to their employees. Employees who need special protection or support are entitled to receive it.

Every form of discrimination, exclusion or favouritism initiated on the basis of ethnic or national origin, gender, religion, ideology or political conviction or on the basis of a disability, illness, pregnancy, age, sexual identity and orientation, social origin, membership in an employee organisation or any other personal characteristic is prohibited.

National anti-discrimination laws and the UN Convention on the Rights of Persons with Disabilities (OHCHR) should be observed without reservation. An anti-discrimination officer must be appointed if such a function is required by national laws.

LOWA has set up a complaint and whistleblower system (see Section VI) available to all employees who have experienced discrimination. We take all reports submitted to the system seriously and will respond in timely manner. We also expect our business partners to actively fight discrimination, carry out sensibility and training measures, communicate the report and complaint options available to employees and make information readily available to them.

## **(6) Occupational health and safety**

Occupational health and safety should be assured and regularly monitored. The work environment, including machinery, equipment, and production procedure, should not pose hazards to individual employees.

Effective risk protection measures should be taken (including fire protection, emergency entrances and exits, first-aid measures and training and prevention programmes). Should special production activities require the use of personal protection equipment (PPE), this equipment must be provided to employees free of charge and in the amount that the job requires. Thorough inspections should be conducted regularly to determine that this equipment is being used correctly.

Employees must be informed of health and safety risks. Training designed to minimise these risks should be conducted. Officers responsible for the occupational health and safety of employees should be appointed. Countries' individual legal requirements must be observed.

Employees have the right to remove themselves immediately from situations that could endanger their health and safety without additional authorisation to do so. Special protection will be provided to particularly vulnerable individuals, including adolescent employees, young mothers, those who are pregnant and people with disabilities.

Business partners are encouraged to guarantee employee accident protection by joining compulsory insurance systems, among other things. If this is not possible, voluntary occupational health and safety insurance policies should be taken out for employees.

Hazardous materials should be labelled and safely stored. A material safety data sheet must be provided to employees at the site. The sheet must include information about employee behaviour during emergencies. Special regulations covering solvent storage facilities should be observed, including accident prevention (incl. leakage protection).

Sanitary facilities and changing rooms (as well as accommodation in case it is provided to employees) must be hygienically immaculate, clean, safe, and available in sufficient quantities.

Sufficient supplies of drinking water should be provided as well.

## **(7) Freedom of association and right to collective bargaining**

The employer recognises the right of all employees to establish associations or organisations that represent employees' interests. If the right to freedom of association and collective bargaining is restricted by law, the employer must not impede other forms of collective bargaining and workers' organisation.

Employee representatives may not be treated unfairly or subjected to discrimination. They must not be hindered in their function and must be allowed access to all workplaces in the performance of their representative functions.

The right to membership in free labour unions and the right to strike shall be observed.

In case business partners cooperate with (private) security services, potential human-rights violations must be prohibited, and steps should be taken to avoid them.

## **(8) Mandatory employment relationships**

We comply with the labour laws that apply in individual countries as part of all our employment relationships and expect our business partners to do likewise.

Obligations towards employees arising from labour and social laws as well as regulations related to regular employment may not be circumvented by using temporary working contracts or training schemes that offer no prospect for further training or full-time employment. Young employees should be given an opportunity to take part in training and advanced training programmes.

At the start of an employment relationship, employees must receive clear information about fundamental working conditions, including their rights and obligations, working hours, remuneration, payment, and accounting procedures.



Coverage under compulsory statutory insurance programmes shall be provided to employees as well. If such coverage cannot be provided, voluntary occupational health, safety and accident insurance policies should be offered to employees.

We respect and protect the right of employees to terminate their employment relationships within the relevant notice period.

## **Protection of local population**

In addition to safeguarding the rights of employees, we also support the rights of the local population at our production sites. In particular, the obligations set out in the following two chapters and the rights of all affected persons, e.g. local residents, must be respected as far as possible in the framework of all business activities.

### **(9) Ban on soil, water, and air pollution**

We take steps to prevent harmful soil, water, and air pollution at all production locations and require our business partners in and outside Germany to do likewise. Noise emissions and excessive water usage should be avoided.

National and international regulations governing soil, water, emission, and noise protection must be observed.

### **(10) Ban on unlawful acquisition of land**

The rights and interests of the domestic population should be taken into account during projects involving the construction and expansion of production facilities as well as the acquisition of land. Unlawful land acquisitions or expropriations are prohibited.

### **III. Environmental Responsibility**

#### **Environmental and nature protection**

Nature provides us with a setting for our outdoor activities, and protecting nature is thus fundamental to our existence and our livelihoods. This is why we as a company have committed ourselves to protecting the environment and nature, using resources conscientiously and minimising the impact of our business activities on the environment, climate and biodiversity. This commitment applies to both the direct impact of our business operations and our production locations.

We take steps to ensure that our footwear is produced and finished in an environmentally conscious manner, that material is optimally used and that our transport operations respect the environment. We reuse materials and raw materials whenever possible.

Avoiding hazardous substances is a major part of these efforts. We use a Restricted Substances List (RSL) to either completely eliminate chemical substances from our products or to reduce them to a minimum. Hazardous substances may be used only if there is no alternative and if they are handled and disposed correctly without harming the environment. We also observe international agreements governing the prohibition of highly hazardous substances.

Waste should be avoided or reduced whenever possible. An environmentally responsible, correct waste management must be assured and should be documented.

Our business partners are also urged to review the environmental impact of their operative business activities and to reduce it as much as possible within their possibilities.

All national and international environmental and nature-protection regulations must be observed. Company environmental and nature-protection measures should be clearly and comprehensibly communicated to employees, and their observance should be regularly reviewed and documented.

Environmental officers should be appointed. Their work must be documented and verifiable upon request.

In detail, the following environmental regulations apply in the LOWA Code of Conduct:

#### **(11) International Agreements on environmental and health protection**

We observe international agreements to protect people and the environment, and our activities are based on them. The use of internationally prohibited substances that are highly toxic and can cause extreme environmental damage is strictly banned from our products and our production facilities. We have developed protective measures to ban the use of hazardous materials.

We expect our business partners to observe international prohibitions and likewise take strict steps to protect people and the environment.

The following global prohibitions apply:

- The Minamata Convention on Mercury, supplemented by EU Regulation (2017/852) on mercury.

- The Stockholm Convention on Persistent Organic Pollutants (POP agreement) governing the ban of certain persistent organic pollutants and the EU's POP regulation (EU 2019/1021) that implements the convention in Europe.
- The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, supplemented by EU regulation (EG 1013/2006) on the shipment of wastes.

## **(12) Climate protection**

Protecting our climate and reducing greenhouse gases are essential if we want to save the environment. For this reason, we take steps in our business activities to achieve the goal set by the Paris Agreement of limiting the global warming to 1.5 degrees Celsius by 2050. We expect the same commitment from our business partners.

## **(13) Chemical safety**

LOWA regularly conducts controls on hazardous substances in materials of its products and packaging. We permit only the use of materials that meet the requirements of the EU chemical regulation (EG) No. 1907/2006 (REACH).

To ensure conformity with the REACH regulation and beyond for the shoe sector, the organisation "cooperation for assuring defined standards for shoe- and leather goods production e.V." (cads e.V.) has defined a list restricting hazardous substances in the EU market: the "cads Restricted Substance List (cads RSL)".

Our products fulfil the requirements of cads RSL, and we require our business partners to verify that their products comply with the threshold values set by the cads RSL. We review this information based on the LOWA Material Query and Declaration of Conformity. We have our materials randomly tested for certain pollutants by recognized external laboratories.

We also require our business partners to review the substances of very high concern (SVHC list) contained in the REACH Candidate List and comply with the threshold values listed therein. The California Safe Drinking Water and Toxic Enforcement Act, or California Proposition 65 (Cal Prop 65), should be observed.

More information:

EU chemical regulation (EG) No. 1907/2006 (REACH) and the SVHC candidate list:  
<https://echa.europa.eu/candidate-list-table>

cads RSL: <https://www.cads-shoes.com/en/documents>

The California Safe Drinking Water and Toxic Enforcement Act (California Proposition 65) (<https://oehha.ca.gov/proposition-65>)

## **(14) Handling of waste and hazardous materials**

We work systematically to identify, handle, and reduce occurring solid waste. We also dispose or recycle this waste in a responsible manner. We expect our business partners to do likewise.

Chemicals and other materials that could pose a threat if released into the environment must be identified and handled in such a manner that safety is assured at all times when these substances are handled, transported, stored, used, recycled, reused or disposed of.

The conventions and international and legal regulations named in paragraph (11), which apply to wastes and hazardous materials around the world should be observed, i.e., the most recent version of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, supplemented by EU regulation (EG 1013/2006) on the shipment of wastes.

## **(15) Animal protection and biodiversity**

We observe the principles related to the protection, husbandry and transport of animals and the preservation of biodiversity and base our business activities on them. The husbandry and use of animals must conform to national and international animal protection regulations and be species-appropriate.

National animal welfare criteria should be observed if they exist.

Our business partners may not use any materials that originate from any species that are endangered or face extinction. The Washington Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) should be observed.

### **The following exclusion criteria must be observed for materials supplied to LOWA:**

Leather/hides: For ethical and environmental-protection reasons, the leather supplied to LOWA may originate only as a side product from animals that were raised for meat production. It must exclusively come from European cattle and must have been produced by European tanneries.

No use of genuine fur: The use of real fur in our products is unacceptable to us. We specifically condemn cage-breeding practices in this regard.

No use of angora hair/wool: Angora (rabbit) hair/wool may not be used.

Wool/merino wool: Any wool and/or Merino wool that is used must not come from animals that were bred or shorn in a harmful manner. Merino wool must not be obtained from sheep or farms on which mulesing was practiced.

No use of down and feathers: LOWA considers live feather plucking and forced feeding of animals to be unacceptable practices. For this reason we use no materials made of down and feathers.

No materials from reptiles and fish: Materials from reptiles (e.g., crocodiles) or fish (e.g., sharks) must not be used.

Exclusion of potentially harmful material treatments: Nano particles, antiperspirants, biocides, and antifungal agents must not be used due to the potential negative impacts they may have on the environment and people's health.



## **IV. Ethical business practices and integrity/ good governance**

LOWA stands for honest and ethically sound business practices that comply with the law. For this reason, we always communicate openly, comprehensively, and honestly. We expect our business and collaboration partners to apply the same transparent and responsible practices.

We condemn every form of bribery and corruption as well as every form of unlawful manipulation or extortion of business partners. We expect ethically correct business conduct from our employees and business partners.

### **(16) No bribery or corruption**

Corruption is a crime that can have serious consequences or even result in prison sentences in Germany and many other countries.

We condemn all forms of bribery and corruption as well as unlawful influence and extortion of business partners.

Our employees and business partners should not attempt to influence third parties unlawfully - neither through favours, nor through gifts or the granting of other advantages. This applies in particular when dealing with government representatives, representatives of public authorities or public institutions.

LOWA condemns and prohibits any business conduct consisting of promising or offering direct or indirect benefits or advantages that could lead to an improper or unlawful interest and/or advantage.

The acceptance of gifts and other personal benefits is not permitted, except in the case of low-value gifts or with the written consent of the supervisor(s) for the acceptance of gifts. All favours beyond this are prohibited and must be refused. The offer of such personal benefits must be reported immediately to LOWA Sportschuhe GmbH so that the necessary steps can be taken.

LOWA has set up a complaint and whistleblowing system for the (also anonymous) reporting of misconduct. We take all information seriously, follow-up on it and ensure that it is remedied promptly. We also expect our business partners to take active steps against corruption and to carry out appropriate information and training measures. Information on the whistleblowing platform must be made available to all employees and should be easily accessible.

All national anti-corruption laws and the UN Convention Against Corruption (2006) apply.

### **(17) Compliance with antitrust laws and commercial regulations**

LOWA advocates fair interaction with business partners and transparent competitive conditions. Unlawful arrangements with employees or customers that could restrict competition and the acceptance of illegal benefits are prohibited. We observe all national and international antitrust laws and expect the same correct conduct from our business partners well.

## **(18) Transparent and honest services**

We expect our business partners to have accurate information regarding their activities, structure, and performance. We also expect them to release this information in compliance with legal regulations. Business partners may not falsify this information or participate in fraud in the supply chain. No unjustified advantage may be obtained as a result of dishonest business practices.

LOWA reserves the right to conduct inspections and audits in cases of doubt or suspicion.

## **(19) Protection of trademarks and patents**

LOWA holds the trademarks and patents to its products. We consider the counterfeit of products and the sale or distribution of LOWA products without our permission as theft. Such practices are explicitly prohibited, and we will pursue criminal charges when such cases arise. We reserve the right to immediately terminate a business relationship in the event of theft or counterfeit of products.

LOWA preserves the right to conduct controls or audits in case of doubt or suspicion.

## **(20) Data protection**

We have a special responsibility to carefully and appropriately handle the personal data that has been entrusted to us. One of our priorities is to ensure that all data protection regulations are observed and implemented in our business processes and our interactions with all employees.

We observe all data protection regulations governing the protection of personal data. We also expect our business partners to act in the same careful and orderly manner.

The collection, storage, use, transmission, sharing or any other processing of personal data must be performed in compliance with national and international rules and regulations governing data protection and information security. A data protection officer should be appointed if such a position is required by national law.

All employees are to be regularly instructed about aspects of data protection. The training should be conducted in an orderly manner and documented regularly.

The EU General Data Protection Regulation / GDPR (EU 2016/679) applies.

Potential violations can be reported via the complaint and whistleblower system: See Section V.

## **(21) Enforcement of the Code of Conduct**

All business partners must observe legal regulations and standards. However, LOWA reserves the right to conduct random reviews of business partners' practices at any time and to inspect products.

We conduct regular reviews of our own production operations and of commissioned production facilities to ensure that our Code of Conduct is being observed. This includes audits that

are conducted to determine whether an agreed-upon plan for corrective actions is being implemented.

Business partners must enable employees of LOWA or third parties to inspect production facilities and provide access to all relevant areas at any time. All essential documents and records are to be maintained. They must be shown and provided to the auditors upon request.

An audit can be conducted without an on-site visit through the examination of documents and records, which are to be provided upon request.

The results of the review will be discussed with the business partner during a feedback meeting. Violations will be remediated with a corrective action plan. They must be remedied within a defined deadline. LOWA will assist the business partner within this process.

## **(22) Sanctions following violations**

When we learn of violations of the Code of Conduct, our top priority is to eliminate the violations quickly together with our business partner.

We reserve the following rights for this purpose:

- (i) We will work with our business partner to draw up plans for corrective action and set a deadline for the violations to be remedied.
- (ii) We reserve the right to suspend or terminate agreements if the violations are serious or if the business partner is not in the position or is not prepared to agree to a plan for corrective action or to comply with it.

LOWA reserves the right to take the following steps (not necessarily in this order) in cases in which the Code of Conduct was disregarded or violations of the Code of Conduct were not remedied on the basis of the Corrective Action Plan:

- Adjustment of payment deadlines for outstanding invoices of the business partner until the Corrective Action Plan has been properly carried out
- Complete assumption of costs by the business partners for damages incurred, corrective measures and audits to be carried out, if necessary
- A warning about a potential suspension of the business relationship
- Suspension of the business relationship for a defined period of time
- A warning about a potential termination of the business relationship
- Permanent termination of the business relationship in instances when recurrent requests to apply the Corrective Action Plan have been ignored or when repeated serious violations of the Code of Conduct have occurred

A business relationship may be terminated without notice if serious violations of the obligations arising from the Code of Conduct have occurred.

The business relationship can be resumed once the business partner remedies the situation by the deadline in the Corrective Action Plan.

## **(23) Communication of the Code of Conduct**

All employees of LOWA and its business partners must be made aware of the Code of Conduct, and it should be easily accessible to them. The Code of Conduct must be communicated to all

employees in their country's particular language. It should be provided to all employees along with their employment contracts or made available as an electronic download. The receipt and acknowledgement of the Code of Conduct should be documented.

LOWA reserves the right to review the communication of the Code of Conduct at production facilities and employees' understanding of their individual rights.

Training programmes and courses designed to implement the Code of Conduct should be initiated. If these programmes are initiated by LOWA, they should be actively supported, and employees should be given time off to take part in them. Attendance at the training courses should be documented.

We expect our business partners to share the obligations arising from the Code of Conduct with members of their supply chains and in such way to facilitate social and ethical production standards. Business partners are responsible for communicating the Code of Conduct to their sub-suppliers and for ensuring that they comply with it. Business partners will report to LOWA about individual sub-suppliers and transparently inform LOWA of their addresses and number.

## **(24) Responsibility and documentation**

Business partners will appoint employees responsible for the implementation of the Code of Conduct. The responsible person(s) will act as a contact partner for LOWA for carrying out and documenting audits and measures related to the Code of Conduct (e.g., work, health, safety, and environmental measures) in an orderly manner. This documentation is to be presented upon request.

## **(25) Business partner relationships**

LOWA Sportschuhe GmbH strives to produce its footwear in Europe and fosters direct, long-term relationships with its business partners.

We consider the implementation of the Code of Conduct as a joint, cooperative responsibility aimed at safeguarding fair working conditions along the supply chain.



## **V. Whistleblowing and complaints regarding violations of the Code of Conduct**

LOWA assumes that all its employees and business partners will act with integrity and in an ethical, correct manner. Our collaboration is based on trust and respect.

We also realise that violations of legal regulations and/or the guidelines contained in this Code of Conduct can nonetheless occur on an individual basis. For this reason, we encourage all employees and business partners to express their concerns,

- **whenever possible, to their immediate supervisors** and to seek assistance.
- **if this is not desired or possible**, LOWA has created a platform to complaints and reports for whistleblowing. It can be accessed at the following address:

<https://app.whistle-report.com/report/325338c3-bef0-46a7-b929-ba06491f477c> [app.whistle-report.com]



Tel.: +49 69 9999 8838

### **Legal Ombudsperson:**

**Karin Holloch**  
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D-40237 Düsseldorf (Germany)  
Tel.: +49 211 540 11 330  
E-Mail: [karin.holloch@business-integrity.lawyer](mailto:karin.holloch@business-integrity.lawyer)

We urge employees to submit a complaint or report where misconduct is indicated. LOWA will take each submitted report seriously, follow up on it timely and will protect the whistleblower. Business partners may not take any disciplinary action against an employee for whistleblowing.

**Please feel free to contact** our Corporate Responsibility Managers at LOWA for any questions regarding the Code of Conduct:

Ingmar Anderson ([ingmar.anderson@lowa.de](mailto:ingmar.anderson@lowa.de))

Veronika Becker ([veronika.becker@lowa.de](mailto:veronika.becker@lowa.de))

## **VI. Acknowledgement to comply with the LOWA Code of Conduct**

LOWA cooperates only with those business partners who pledge to observe the LOWA Code of Conduct.

We hereby acknowledge that we comply with the LOWA Code of Conduct.

*between*

<b>LOWA Sportschuhe GmbH</b>	/	<b>LOWA R&amp;D S.r.l.</b>	/	<b>LOWA Production s.r.o.</b>
Hauptstraße 19	/	Via Schiavonesca 89	/	Továrenská 10
85305 Jetzendorf	/	31030 Caselle di Altivole/		95618 Bošany
Germany	/	Italy	/	Slovak Republic

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Signature of Management (LOWA)

*and*

Company name and address:

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OAR registry no. (if any): \_\_\_\_\_

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Date and place

Company Management Signature and seal/stamp

*Please return the signed Code of Conduct to your contact at LOWA Sportschuhe GmbH or [info@lowa.de](mailto:info@lowa.de).*