

Code of Conduct

November 2021 –

The mission of MAINPOL GmbH is to provide innovation to our retail partners through forward thinking and with a commercial product. At the same time we continue inspiring and cultivating our employees through our core values.

We are committed to:

- o A standard of excellence in every aspect of our business,
- o Ethical and responsible sourcing,
- o Respect for the rights of all individuals,
- o Compliance with all legal requirements,
- Respect for the environment.

We expect this same commitment to be shared by all our employees, vendors, customers, suppliers and manufacturers.

The following Code of Conduct establishes the framework for the above commitment and defines the minimum standards that all our employees and suppliers must meet. Whether we start or continue a business relationship with a supplier depends primarily on their commitment to and compliance with these standards.

Introduction

The MAINPOL Code of Conduct specifies the demands of business conduct which we see as basic in our dealings with merchandise suppliers and partners. This code of conduct is valid for all partners who produce merchandise for MAINPOL. It has been devised in support of the protection of every individual human rights and liberty along the supply chain of our business. We are motivated and persistently working on improving working conditions and our ecological footprint.

The commitment is to respect and protect individual human rights and dignity. It is valid for our clients, which share the same core belief and values and are committed towards social, ethical and sustainable standards. The foundation for a long-term business relationship is a fair and honest dealing at all times.

Even though we are working with suppliers and business partners, which have different cultural backgrounds, standards and values, following particular standards are generally admitted and must be complied with during all our commercial activities.

Following standards are set as the core for our actions at the workplace:

Legal Compliance

National laws are complied with. Work and safety regulations are followed. Design patterns and intellectual property rights and trademarks are respected. Anti-corruption and no bribery have to be supported and followed.

MAINPOL GmbH will only do business with vendors/factories that adopt and adhere to rules and conditions of employment that respect workers and at minimum safeguard their rights under national and international labor and social security laws and regulations.

MAINPOL GmbH specially requires that all agents/factories comply with all applicable laws and

regulations relating to the exportation and importation of merchandise, including country of origin, labeling, customs classifications and valuation and all laws prohibiting transshipment of merchandise. Where local industry standards are higher than applicable legal requirements, the higher standards apply.

Labour

Based on respect for the fundamental human rights, freedom of employment must be guaranteed. Forced labour, child labour, slave labour and any illegal form of employment is forbidden and will not be tolerated in any way.

The identity of each person is to be maintained - i.e. employees cannot be forced to hand over their documents of identity to the employers.

Discrimination and punishment in employment is not tolerated. Vulnerable groups have to be protected and treated equally.

The freedom of association and collective bargaining has to be granted.

The work environment has to be safe and hygienic.

Working hours cannot be excessive.

Workers should be employed on regular basis and receive their wages on time.

Forced Labor

MAINPOL GmbH will not work with any vendors/factories that uses any forced or involuntary labor, whether imprisoned, bonded, trafficked, indentured or otherwise.

Labour of child

Child labour cannot take place and is absolutely unacceptable. An infringement against this basic principle would be treated with zero tolerance and result in the termination of the business relationship and legal action.

MAINPOL GmbH will not work with any vendors/factories that utilize labor under the age of 16 or under the age of completion of compulsory education, whichever is higher. Workers must not be younger than 16 years. If local regulations provide for higher age limits they have to be followed. Every child is to be protected from exploitation and work which may expose this person to danger; this also extends to activity, which may hinder a child's natural physical, spiritual, moral and social development.

Hazardous work has to be performed by workers of at least 18 years old.

Abuse & Harassment

MAINPOL GmbH requires that all vendors/factories treat each employee with dignity and respect, and that they will not use corporal punishment, threats or other forms of unlawful, physical, sexual, psychological or verbal harassment or abuse or coercion, whether mental or physical. All our Agents/factories must implement a non-retaliation policy that allows workers to freely express their concerns about workplace conditions

Non-Discrimination

Discrimination of any kind is prohibited. Equality and equal opportunities are to be guaranteed for all employees irrespective of race, skin colour, sex, creed, political view, nationality, social background, culture or any other distinctions.

MAINPOL GmbH will not work with any vendors/factories that discriminates in their hiring and employment practices, including compensation, advancement, discipline, termination, retirement or other on the basis of race, ethnic origin, national origin, religion, age, marital status, capacity to bear children, pregnancy, HIV or any other medical status, sexual orientation, gender, political opinion, social status, legal migrant worker status, disability, or other legally protected category.

Working terms

Working terms must be carried out under conditions which are proper and adequate in regards for the health and safety of those involved. Wages and benefits must be fully comparable with local norms

and all local laws.

The paying out of wages and other benefits has to take place regularly, on time and directly to the employee. Working hours have to be in accordance with working-time regulations and current law

A safe working environment including occupational hygiene must be provided and a maximum effort is to be made to ensure and promote health protection.

Wages and Benefits

MAINPOL GmbH requires that every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income.

Vendors/factories shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages and provide any fringe benefits required by law or contract.

Where compensation does not meet workers' basic needs and provide some discretionary income, each employer shall work with the MAINPOL GmbH to take appropriate actions that seek to progressively realize a level of compensation that does.

Working Hours

MAINPOL GmbH requires that all vendors/factories must comply with all applicable laws and regulations related to work hours, including but not limited to hours of work, overtime, maximum hours, rest day, and holidays.

The regular working hours per week shall not exceed 48 hours; other than exceptional circumstances, the total of regular and overtime hours per week must not exceed 60 hours. All overtime work shall be consensual. In addition, employees will be entitled to at least 24 consecutive hours of rest in every seven-day period. Vendors/factories must not request overtime on a regular basis and shall compensate all overtime work at a premium rate.

Vendors/factories must also provide employees with a clear written accounting statement for every pay period and must not deduct or withhold wages or benefits for disciplinary infractions.

Health & Safety

MAINPOL GmbH requires that all vendors/factories provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities.

Environment

The environmental performance has to be aligned with legal requirements.

The management of the production unit has to improve water and energy efficiency according to the possibilities on a regular basis. Emissions, waste and the use of hazardous chemicals shall be reduced as well.

MAINPOL GmbH requires that all vendors/factories comply with all applicable local environmental laws and regulations and adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

Subcontracting

MAINPOL GmbH strictly prohibits unauthorized production and requires that no agent/factory will use any unauthorized facility for the manufacture of MAINPOL GmbH merchandise or components thereof without MAINPOL GmbH express prior written consent, and only after the subcontractor has entered into a written commitment with MAINPOL GmbH to comply with this Code of Conduct.

Documentation and Monitoring

At its discretion, MAINPOL GmbH and its designated agents (including third parties) may engage in monitoring activities to confirm compliance with this Code of Conduct, including announced or unannounced on-site inspections of manufacturing facilities and employer-provided housing, reviews of books and records relating to employment matters, private interviews with employees, or certification by

the agent/factory that MAINPOL GmbH's Code of Conduct has been complied with. All documentation that might be needed to demonstrate compliance with this Code of Conduct shall be maintained for at least one year.

Freedom of Association

MAINPOL GmbH requires that all vendors/factories recognize and respect the right of employees to freedom of association and collective bargaining.

Ethical Standards

MAINPOL GmbH will only work with agents/factories that conduct their business by a set of ethical standards, which are compatible with MAINPOL GmbH's standards. It is strictly prohibited to offer or receive bribes, kickbacks, or any other similar unlawful or improper payments to or from our representatives, government officials, 3rd parties or any person or entity to obtain or retain business, and/or direct/shape the outcome of 3rd party QC inspections and social compliance audits.

Gift Policy

MAINPOL GmbH prohibits their <gents/factories the giving of any and all gifts of any sort, no matter the value, including any type of monetary consideration, gift card, or 'personal loan' to any MAINPOL GmbH employee for any reason, at any time.

Inspection

MAINPOL or an authorized representative is entitled to undertake unannounced inspections at any manufacturing facility including those of sub-contractors at any time. All suppliers are obliged to make their sub-contractors aware of the MAINPOL code of conduct.

Sanctions

Although we believe that all suppliers will follow the requirements set in this code of conduct, we will not hesitate to stop our business relationship including the cancellation of outstanding orders, in case of any infringement.



MAINPOL GmbH, Albershausen Germany –