

# **SUPPLIERS CODE OF CONDUCT**

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## 1. Mission

### WALKING WITH PURPOSE

Delighting people with a playful, sustainable and responsible walking experience

## 2. Values

### Real

We have been shoemakers for over 140 years. Quality and craftsmanship remain at the heart of what we do.

### Imaginative

Camper thinks differently. And we want to be seen to be different. But not in a loud, showy way. We will add a twist of understated imagination to everything we do – in product, retail and communication.

### Playful

Camper is from the Mediterranean. We are serious about what we do but do not take ourselves too seriously. We walk, we don't run. And we will always try to add a smile to life.

### Caring

Camper is about people with local values and global horizons. We will do the right thing for the people and the environment wherever we work.

## 3. Context

Camper is committed to having a positive impact on society and on the environment. Our objective is to operate as a sustainable, responsible and successful business. In this way, at Camper we work to ensure the highest quality and safety in our production, as well as improve our operations and develop new and innovative ways to minimize our environmental impact and ensure a positive social impact, whilst ensuring our commitment to the use of high-quality materials, manufacturers, products and services.

Camper seeks to hold long-term partnership with the first-level suppliers that share the same values. Contracting with suppliers is carried out under criteria of objectivity and transparency, seeking the most appropriate combination possible between business solvency of the supplier and the interest of Camper in obtaining the best conditions possible within the most stable environment.

#### **4. Scope of application**

This Code of Conduct is applicable to all Camper suppliers that manufacture, finish, pack, otherwise handle products or perform services for Camper. All suppliers must comply with this Code of Conduct and all applicable laws and regulations in the countries and territories in which they operate. Where the requirements of this Code of Conduct set higher standards than is required by local laws and regulations, suppliers and partners must align with the requirements of this Code of Conduct.

This declaration describes the environmental, social and ethical manner in which Camper acts in its business relationships, and the minimal requirements that are requested to all companies which intend to establish commercial relations with Camper as suppliers. This also includes all suppliers' subsidiaries or branches, as well as their subcontractors, on the understanding that any of these who accept and subscribe to this Code of Conduct will be responsible for complying with its requirements, and ensuring that they are fulfilled by their managers, employees, related entities and subcontractors.

All suppliers are responsible for distribution, education and ensuring compliance of this Code of Conduct and all relevant laws and regulations with their own business partners and upstream value chains.

This Code of Conduct is reinforced by the Camper's Corporate Governance pillars and with some other policies of the company including the Procurement Policy, the Anti-corruption and Fraud Policy, the Environment Policy, the ESG Policy, the Equality, Diversity and Inclusion Policy, Occupational Risks Prevention Policy, Ethical Marketing Policy and the Whistleblower Channel.

#### **5. General commitments**

The suppliers must comply with all relevant legal requirements to the conduct of their businesses and they are committed to: (i) meet all standards contained herein and other that Camper might include in the future; (ii) render full cooperation and assistance to Camper staff in all related matters; (iii) allow all Camper audits and inspections that might be necessary to implement and monitoring this Code of Conduct; and (iv) adopt corrective measures that might be dedicated as a result of Camper's surveillance activities for ensuring the adequate fulfilment of this Code of Conduct.

The suppliers commit to adopt and follow the necessary practices which safeguard human rights, labour and social conditions, safety and the environment.

## **6. Specific commitments**

The specific commitments have been set following the guidelines of international sources such as The Ten Principles of the UN Global Compact, Conventions and recommendations of the International Labour Organization, among others.

### **I. Environmental commitments**

Camper seeks to increase the environmental quality of the materials, components, packaging, goods and services utilized in all stages of the supply chain, as well as all processes inherent therein by means of the use of environmentally-efficient products and services from responsible suppliers that guarantee compliance with Camper policies and the transparency of their supply chain.

The specific commitments regarding environmental matters are as follows:

- **Environmental protection**

It is expected that Camper suppliers act in a responsible and sustainable way with respect to the environment, that include: (i) compliance with the environmental regulations; (ii) conservation of the natural resources; (iii); environmental management systems; and (iv) safe waste management and residual discharges.

- **Sustainable materials**

It is expected that Camper suppliers (i) use alternative and increasingly environmentally-efficient materials from reliable sources that meet the requirements of quality, durability and maximum excellence, with the specific objectives of increasing the use of more harmless materials as well recycled materials into finished products and sustainable packaging; (ii) respect own List of Restricted Substances which intends the elimination of toxic substances and progressive substitution of the rest of materials with other, less aggressive ones, insofar as the products are available on the market and comply with similar quality standards.

- **Sustainable production**

It is expected that Camper suppliers (i) manufacture our products in a responsible and sustainable way with respect to the environment, (ii) implement sustainable production processes; (iii) ensure the animal welfare and the conservation of biodiversity; (iii) reduce the use of toxic substances and chemicals; (iv) water consumption management and (v) management of the end of the life cycle of the products.

- **Clean energy**

It is expected that Camper suppliers act in a way to promote the transition to green energy, that include (i) search for alternative clean energy sources; (ii) shifting to sustainable transportation; (iii) reducing the energy consumed in order to minimize and/ or compensate the environmental impact of the activities across our value chain; and measuring and reduction of the carbon footprint.

## II. **Social commitments**

Camper seeks to increase the positive impact on society and describes a series of basic values in terms of human rights, social and labour conditions and safety and health conditions.

The specific commitments regarding social matters are as follows:

- **Human rights**

Camper suppliers must act in a way to promote the respect and protection of the internationally recognized human rights.

- **Labour rights and conditions**

Camper suppliers must act in a way to: (i) ensure that no type of forced labour and child labour is carried out; (ii) not to use any workers below the minimum legal working age (under 16) and ensure that all juvenile employees are properly identified and get the protection that local regulation grants for those workers under 18; (iii) ensure that employees do not exceed in regular conditions the maximum working time per week including overtime; (iv) not to discriminate in any way in terms of employment; (v) respect the freedom of association and effective right to collective negotiation of the workers; (vi) equal opportunities; (vii) protection of migrant workers; (viii) hiring of workers with exclusion risk.

- **Wages and social benefits**

Camper suppliers must act in a way to (i) ensure fair wages; (ii) adequate social benefits; and (iii) medical assistance pursuant to applicable local laws.

- **Safety and healthy conditions**

Camper suppliers must act in a way to ensure the health and safety of all employees: (i) all installations, buildings, facilities, dormitories and workplaces must be safe, with the adequate emergency resources duly available and with emergency exits properly signalled; (ii) there must be an evacuation plan available and employees must have received the adequate training about evacuation and emergencies as well as first aid (medical) training; (iii) all employees working with hazardous materials must receive the adequate training and correspondent personal protection equipment; (iv) all chemicals must be properly stored in the adequate conditions.

- **Community**

Camper suppliers, their business partners and employees, are encouraged to support local social and environmental community charity efforts by volunteering time and/or providing other types of support as appropriate.

## III. **Governance commitments**

Camper seeks to apply the best corporate governance practices internally and expects that suppliers implement corporate practices and management systems that ensure the compliance

of laws and regulation, including the standards of this Code, business ongoing and improvement in their operations.

The specific commitments regarding governance matters are as follows:

- **Governance and compliance**

Camper suppliers must compliance with the local and international laws and regulations where we operate directly and indirectly.

- **Acting ethically and with integrity**

Camper suppliers must act in an ethical form and in good faith and must not become involved under any circumstances or in any type of corruption and/or bribery.

- **Protection of industrial and intellectual property**

Camper suppliers undertake to respect all intellectual and industrial property rights, designs, trademarks, copyrights, patents and any other rights, registered or otherwise, that may be used by Camper. It will therefore abstain from using such rights unless it is done pursuant to specific instructions received from Camper, and it will extend such obligation to its team and to any third parties that may collaborate with the supplier.

- **Unauthorised subcontracting**

Camper manufacturers will be obligated to render any services arranged in its own installations and with its own personnel, duly trained and equipped for this with the necessary resources, without resorting to subcontracting without the express authorization from Camper in each case. The organization and management of the work by the team that takes part in the rendering of the services arranged with Camper will solely and exclusively correspond to the manufacturer, and Camper, in its capacity as client, solely reserves the right to prioritize any points that may be necessary for the optimization of the service rendered.

- **Transparency and traceability**

Camper suppliers will be required to map and continuously track and monitor all locations in all levels of their supply chain and, upon request, provide transparency information into the owned and/or subcontracted farms, mills, plants, factories and other sites that are involved in the production of our products.

- **Ethical marketing**

Camper suppliers must comply with the relevant laws, regulations and self-regulatory codes (including The International Chamber of Commerce (ICC) Code on Advertising Practice) related to marketing, advertising and promotions.

- **Conflict of interest**

Camper suppliers will be obligated to notify Camper of any possible conflict of interest about which it is aware, regardless of whether or not the Camper employee allegedly affected by it has notified the existence of such possibility to the company. In this way, any Camper employee that

is or could be affected by a potential conflict of interest upon negotiating or contracting with the supplier within his range of operation should bring this to the attention of company management and, consequently, abstain from undertaking any action whatsoever until receiving express authorization.

- **Protection of personal data of employees and confidential information**

Camper suppliers will be obligated to protect and ensure the privacy of the personal data of all their employees and business partners.

- **Financial performance and inclusive growth**

Contracting with supplier will be undertaken under criteria of objectivity and transparency, seeking the most appropriate combination possible between business solvency of the supplier (technical, financial and ethical) and the interest of Camper in obtaining the best conditions possible within the most stable environment and allowing our suppliers to share in our growth with dignity and independence.

## **7. Adoption and Implementation**

Camper undertakes to deliver this Code of Conduct to all employees that are directly or indirectly involved in supplier contracting processes. All employees will have access to this Code of Conduct via the company Intranet. Any modification, change or addition to the Code of Conduct will duly communicate to all employees through the internal Communications Portal.

With regards to the suppliers Camper will communicate this Code of Conduct to current suppliers and new suppliers at the outset of any business relationship, and as appropriate thereafter. The suppliers will implement and integrate the guidelines of this Code of Conduct into their operations and will ensure compliance among their value chain.

Camper additionally assumes the commitment to training employees and suppliers in a regular basis, and at least annually, to ensure the good understanding and acceptance of this Code of Conduct.

## **8. Monitoring and Auditing**

Camper is responsible for ensuring compliance with the commitments established in this Code of Conduct and the suppliers acknowledge and understand the importance of meeting Camper's environmental, social and governance standards not only as a good business practice but also to protect Camper brand reputation and product consumer perception. Accordingly, suppliers shall not be involved in any practice that might harm or diminish the said reputation of the brand or products.

The suppliers undertake to collaborate with Camper on any aspect relative to the monitoring of this Code of Conduct and to allow Camper access to its installations, employees and documentation to verify compliance with the environmental, social and governance commitments. In this regard, the suppliers are aware of and accepts that Camper's employees or third parties carry out audits and/or inspection activities and/or announced visits.

In the event of the breach by the suppliers of this Code of Conduct Camper, considering the gravity of the situation, of the financial consequences and, above all, of the risk to the reputation



of the brand and the products, may require adopting any corrective measures that may reasonably be proposed by the auditors in order to achieve the standards of this Code of Conduct or unilaterally suspend and even terminate any collaboration with the suppliers, without this entailing any waiver of the claim for the corresponding damages caused.

## **9. Governance**

The Executive Committee, ESG Committee and Supply Chain Committee are responsible for monitoring the effectiveness of this Code of Conduct and reviewing the implementation of it on a regular basis.

All Camper directors, employees, workers and suppliers are expected to do business in accordance with this Code of Conduct. Third parties should be managed to fulfil the requirements of this Code of Conduct by relevant department leads and performance against this Code of Conduct will be included in the assessment of contractual relationships.

## **10. Whistleblower Channel**

Should any third-party suspect that this Code of Conduct is not being upheld or there are breaches which go against the principles set out in this document they can report the matter to their immediate superior or the Head of Supply Chain.

For these purposes, Camper makes available to all stakeholders a reporting channel tool managed by a third party, available at <https://report.whistleb.com/en/camper>, which guarantees the confidentiality of the report, unless the employee expressly and voluntarily provides the contact information and authorizes its use, or that is essential to continue with the reporting process.

The Whistleblower Channel, available at Camper Intranet, describes the procedure that staff must follow to report misconduct, or suspicion thereof and the way the report is treated. The Whistleblower Policy also describes the guarantees regarding confidentiality and the protection that staff have.

Camper does not allow any kind of reprisals against staff members who have reported a violation, or possible violation, in good faith, and guarantees to keep confidentiality and prevents any disciplinary action against the staff who have reported such violation.