



At Apparel Group, we believe in constantly exceeding the expectations of our stakeholders, customers, employees, suppliers, and, very importantly, our planet. We are committed and determined to apply the highest standards for our business conduct, as we are responsible for acting as role models.

We act with Respect and Integrity and thrive through Excellence and Innovation. These values are evident throughout the entire chain, from the business concept to the vision, policies, and business and operational plans and are continuously monitored. They profoundly impact the way we perform and carry out our assignments.

This Code of Conduct will apply to the Board of Directors, Employees, Contractors, and the Business Partners of Apparel Group.

We expect our external partners to comply with these guidelines and integrate them within their organisation and value chain.

This Code of Conduct serves as principles to the ethical and legal responsibilities we share as members of the Apparel Group family. This is not a complete rulebook that addresses every ethical issue that might arise and is not a summary of all laws and policies that apply to the Apparel Group business.

Our Governance and Business Ethics

At Apparel Group, strong corporate governance is imperative to achieving business success and embedding sustainability into the fabric of our culture as an organisation. With the support and direction of our Board of Directors and the leadership of our executive management team, we strive to protect the rights of all stakeholders and conduct our business operations to the highest ethical standards.

We are guided by a sound risk management framework and work diligently to eliminate bribery, corruption, and human rights abuses across our entire value chain. We expect sound performance across socio-economic and environmental factors from ourselves, suppliers, and business partners.

We are committed to safeguarding our customers` data and privacy and seek to develop innovative digitisation processes to enhance business performance and customer experience further.

- **Competition**

Competition laws govern relationships between the organisation and its competitors. Contacts with competitors should always avoid subjects such as prices or other terms and conditions of sale, customers, and suppliers. The organisation`s employees, agents or contractors may not knowingly make false or misleading statements regarding its competitors or the products of its customers or suppliers.

Participating with competitors in a trade association or a standards creation body is acceptable when the association has been adequately established, has a legitimate purpose, and has limited its activities to that purpose.

We should never attempt to obtain a competitor`s confidential information improperly, mainly never contacting a competitor regarding their confidential information. While the organisation may, and does, employ former employees of competitors, we recognise and respect the obligations of those employees not to use or disclose the confidential information of their former employers.

- **Corruption**

No such situation should arise where employees offer to pay, make payment, promise to pay, or issue authorisation to pay any money, gift, or anything of value to customers, vendors, consultants, etc., that is perceived as intended, directly or indirectly, to improperly influence any business decision, any act or failure to act, any commitment of fraud, or opportunity for the commission of any fraud. Inexpensive gifts, infrequent business meals, celebratory events and entertainment, provided that they are not excessive or create an appearance of impropriety, do not violate this policy.

Questions regarding whether a particular payment or gift violates this policy should be directed to Human Capital or the Legal Department.

- **Fraud**

Employees are prohibited from participating in any activity involving theft, fraud, embezzlement, extortion or misappropriation of property. Fraud occurs when you intentionally conceal, alter, falsify or omit information for your benefit or the benefit of others. Fraud may be motivated by the opportunity to gain something of value, such as meeting a performance goal or obtaining a payment, or to avoid negative consequences, such as discipline. We must always avoid actions that create the appearance of fraud. For example, never spend Company funds without proper approval. Not to agree on behalf of the company unless authorised to do so.

- **Corporate Digital Responsibility**

The Apparel Group has many digital platforms that come with responsibility. Therefore, we have set up strict privacy rules and policies covering all aspects relating to the collection and use of information of Apparel Group consumers.

We ensure that we act transparently, protect and secure the data, respect the rights of our consumers and comply with all legal requirements.

- **Grievances**

Our **Speak Up & Stay Safe** channel is open for all stakeholders to communicate any doubts or knowledge of illegal, unethical or aberrant behaviour, such as fraud, theft, harassment, or other matters deemed necessary for us to act on. A committee of six people from various company departments will review the reports. Whistleblowers will have an answer within seven business days, and if needed, further inquiries may be made while preserving the informant's anonymity.

Our People

- **Human and Labour Rights**

We fully comply with the local laws and legislation in all the countries where we operate. We expect the same from our suppliers.

Human rights are universal and apply to every person, project, and country. They state that everyone, irrespective of country, culture and context, is born free and equal in dignity and rights. Respecting human rights also means not being an accessory to abuse by identifying, preventing and managing the actual or potential impact on human rights in our sphere of influence.

In our business dealings, this means ensuring that suppliers we partner with create a foundation for similar conditions, considering workers' perspectives and needs and contributing to their safety and peace of mind.

As a Fashion Industry leader, it is our role to influence working conditions by setting high standards and requirements to ensure that the extraction of materials and production take place in a socially responsible way.

How do we ensure the above?

1. A human rights risk analysis is always carried out for assignments outside of our home market.
2. We support industry-wide initiatives to prevent crimes against human rights upon extraction of raw materials.
3. Our legal department ensures that Apparel Group, our partners and suppliers adhere to the following conditions:
 - Ensure freedom from forced labour, bonded labour, and human trafficking.
 - Child Labour: adhere to local laws relating to the minimum working age and not engage in the employment of child labour, directly or indirectly.
 - Wages & Benefits: comply with the Wage Protection Laws, Workmen`s Compensation Laws, and General Labour Laws, and ensure the protection of workers` welfare.
 - No discrimination in the workplace.
 - Freedom of Association and Collective Bargaining. Where restricted under law, employees should have the right to develop parallel means.
 - Health, Safety & Working Conditions: ensure all employees are provided with a safe and hygienic work environment with an awareness of work-specific hazards and provide necessary training.
 - Human Rights: the prohibition of human rights abuses of all kinds and the availability of grievance mechanisms accessible to all workers without fear of retribution.
 - Anti-discrimination: shall have a policy that explicitly bans discrimination/bullying and harassment based on sexual orientation, race, gender or gender identity/ expression.

- **Happy and Healthy Workplace**

Our employees are the heart of our business. We are committed to building and maintaining an outstanding workforce by attracting, training, and retaining talented individuals. Our employees undergo the necessary training to develop their full potential. We combat any form of discrimination to provide our employees with an inclusive, safe, and healthy work environment.

We seek to provide our employees with various opportunities and platforms to confidently provide feedback about any work-related issues and be involved in the development and execution of our business strategies.

We are committed to maintaining our facilities` highest health and safety standards. Our employees are provided with ongoing OH&S training and are encouraged to adopt the safety culture we have established at Apparel Group.

- **Diversity and Inclusion**

An inclusive and diverse workforce promotes productivity and wellbeing and speaks volumes about an organisation's culture. We employ and support employees from diverse cultural backgrounds and ages and have zero tolerance for discrimination based on gender, age, race, or colour. Our Human Resources policies on anti-harassment and equal employment opportunities support our commitment to equity and diversity. Our leadership team and Human Resources business partners have set diversity KPIs to further enhance our efforts towards building a more diverse and inclusive workforce.

We are dedicated to providing people of determination with an inclusive and comfortable work environment across our business and have created a specific and adapted Retail Internship Program.

- **Anti-Harassment and Grievance Handling**

The Apparel Group Anti-Harassment Policy outlines our commitment to providing employees with a safe, flexible and respectful environment. The policy guides all employees about systems and procedures to protect them from discrimination, bullying and sexual harassment. Our employees are expected to treat others with dignity, courtesy and respect, and every employee has the right to work in an environment free from all forms of discrimination and conduct which can be considered harassing (including sexual harassment), coercive, or disruptive.

Our dedicated, independent and unbiased Anti-Harassment Committee is tasked with critically evaluating each harassment case and providing a detailed analysis of the case in strict confidence. The Committee will arrive at a final decision and submit the case analysis to the Human Resources department for appropriate action.

Our Grievance Handling Policy is a formal system developed to address employee grievances on matters associated with the organisation. The policy aims to provide all employees with the means to confidently submit formal complaints and be assured that their grievances will be addressed. Our Employee Grievance Committee addresses and resolves any grievances that cannot be directly resolved with that employee's direct supervisor or associated Head of Department.

- **Gender Equality**

At Apparel Group, we are committed to enhancing gender balance in our workforce and creating an atmosphere that encourages and supports the roles of both males and females. We recognise the immense contribution that women in the workforce make across all fields and aspire to build a work environment that is gender inclusive and has zero tolerance for gender inequality or discrimination. Our Chairwoman and Founder of Apparel Group, Mrs. Sima Ved, advocates gender equality in the workplace and actively oversees our progress towards gender balance at Apparel Group. To demonstrate our commitment to achieving gender balance in the workplace and community, we have been an active

member of the UN Women's Empowerment Principles since 2015. UN Global Compact and UN Women established this initiative in the recognition that businesses have a stake in, and responsibility for, gender equality and women's empowerment.

- **Health and Safety**

Our workforce is the foundation of our business and our greatest asset. We seek to maintain a safe and healthy work environment for all our employees and promote their physical and mental wellbeing wherever possible. We consider adopting a safety culture one of the fundamental elements of our business.

We have clear Occupational Health and Safety (OH&S) protocols and measures to help identify and mitigate any risks to our employees. Our OH&S team is responsible for developing and implementing these protocols and measures and providing the necessary support and training to employees across our business. With strong support from corporate management, our OH&S team continues developing new and improved methods to maintain a safe and healthy work environment across all Apparel Group facilities.

Our Health and Safety Policy is communicated to all employees upon their tenure at Apparel Group. This policy clearly states our commitment to maintaining the highest levels of health and safety throughout all aspects of our business and our commitment to continuous improvement. Some critical aspects of our OH&S Policy Action Plan are:

- Comply with all applicable Health and Safety laws and regulations in the countries where we operate.
- To ensure a safe, healthy, secure workplace, provide adequate staff, equipment and material resources to meet set objectives and targets.
- Provide our employees and contractors with the knowledge and capability to achieve OH&S excellence, including empowering them to stop work which they believe is unsafe.
- Set operational and compliance objectives and be accountable for our performance.
- Communicate our principles and results to employees, contractors, regulators, communities and other stakeholders.

- **Wellbeing**

We understand that supporting the wellbeing of our staff, both mentally and physically, is just as important as safeguarding their health and safety. We firmly believe in providing a work environment that encourages healthy lifestyle behaviours, provides support to improve physical health, and offers the means for employees to maintain their mental wellbeing. We are proud of our record at Apparel Group in developing engaging and impactful initiatives aimed at helping our employees live healthy and happy life.

• **Training and Development**

Training, developing and upskilling our employees is imperative to maintaining a successful business and ensuring employees feel empowered and fulfilled. Our training and development programs are created in a way that allows employees to acquire the knowledge and skills they require to perform effectively in their roles while also enabling and supporting them to achieve their career progression and personal development goals.

We recently made some significant changes to our training department, which now focuses on developing job-specific training programs for frontline staff (i.e., in-store personnel) and back-office staff while providing them opportunities to upskill.

Our Environment

We understand that as a leading retailer, we must take meaningful steps to manage the environmental impact of our operations. That is why we are working to minimise the negative impact of our operations on the environment by supporting and adopting national and international efforts to preserve natural resources.

We seek to Reduce:

- Our energy and emissions footprint by exploring new and effective ways to manage our consumption and minimise our carbon footprint.
- Our water consumption by installing an efficient system in our office and a wastewater treatment facility. The water is then used for landscaping and flushing.
- Our waste generation by taking various initiatives throughout our facilities that encourage both the avoidance or reduction of waste generation and recycling.

And increase:

- Our use of more sustainable packaging for our products. We are committed to acquiring and implementing the latest technologies to enhance efforts to reduce our environmental impact. We also aim to support regional and international initiatives on climate action and biodiversity protection through collaboration and partnership with relevant organisations.

We must raise awareness about environmental issues with our employees, stakeholders and customers, which we do through training, marketing and communication.

We encourage our partners to adopt the same approach starting by complying with their local laws and regulations regarding the protection and preservation of the environment and keep innovating and being on the lookout for industry-wide solutions.

Our Social Responsibility

At Apparel Group, we strive to ensure our products comply with the highest quality and safety standards. We market our products ethically, empowering customers to make informed purchasing decisions. We seek to increase our range of sustainable products through our strong partnerships with key brands and our brands.

A commitment to society is a natural element of Apparel Group's corporate culture. We nurture a culture of community investment and philanthropy that aims at supporting and prospering the communities in which we operate.

We seek to promote Nationalisation to support local talents in their career aspirations within the Fashion and Lifestyle sector.

We are part of a community that we endeavour to support, develop and empower.

- **Product Quality, Safety and Sustainability**

At Apparel Group, we believe delivering high-quality products and services to our customers is fundamental to our success. We also recognise the growing imperative to diversify our product offerings to include more sustainable options. This is not only in response to increasing customer demands for more sustainable product options but because, as a leading retailer, we believe it is our responsibility to drive positive change within the fashion and lifestyle industry.

Apparel Group operates multiple business portfolios as a manufacturer and retailer partner, making it essential that we identify our areas of direct control over product quality. Our primary objective across all our portfolios is to ensure that our products meet the highest levels of quality and safety within the industry and in the areas in which we operate. In addition, we seek to ensure the provision and promotion of a continuously increasing number of sustainable products on offer to our customers through our franchise brands and our brands.

We strive to develop strong partnerships with renowned brands where we can guarantee the quality of the products on offer. We are also working diligently to develop new partnerships with more fashion and lifestyle brands that use sustainability to guide their core operating philosophy. We currently franchise some of the world's highest quality and most sustainable brands.

- **Customer Experience and Responsible Marketing**

As a major fashion and lifestyle retailer, customer experience and satisfaction are priorities. We continuously seek new and innovative ways to connect to our customers and enhance their experience across all our platforms. We also strive to ensure that our products are labelled by government regulations and provide accurate and transparent information to our customers. We not only apply this principle to our products but to all our advertising activities and marketing campaigns.

Our marketing efforts are not limited to promoting our products but also to promoting sustainable products and sustainability initiatives and supporting community development initiatives and charitable causes.

• **Community Engagement and Development**

At Apparel Group, we believe that we can achieve social and economic prosperity for all through the collective efforts of individuals, governments, and businesses. As a large regional business, we leverage our resources and influence to drive positive change in our community.

Since Apparel Group's establishment, we have greatly emphasised creating and contributing towards social value in our communities. Through our core business activities, advocacy on important issues, and collaboration with key community partners, we continue to generate positive social and economic value for our communities.

Our CSR strategy has been developed around the following critical areas to focus our resources and efforts on essential and relevant social issues in a way that will have a meaningful impact on our community:

- Identify community needs and relevant causes to support.
- Identify suitable NGOs/groups/partners and develop long-term relationships.
- Develop and implement initiatives through employee volunteering, in-store activation, and social media, as well as sponsorship of fundraising events, awareness campaigns, workshops etc., in collaboration with our partners.
- Identify and implement initiatives that have synergies with our areas of operation/business to maximise impact. This will often include product (in-kind) donations.
- Conduct impact analysis/ROI for each partnership and collect feedback from relevant parties regarding the impact of our activities to find ways to improve and increase our impact year-on-year.

• **Nationalisation**

At Apparel Group, we understand the importance of Nationalisation within the private sector and strive to increase the representation of nationals within our workforce. Through our Internship Program, we focus on providing opportunities for young Emirati college graduates to gain skills and experience within a corporate environment. Emirati interns are provided exposure to various departments and the opportunity to learn business skills with on-the-job mentors. They are also enrolled in the Apparel Group Alumni Network to stay informed on all future job opportunities.