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# Code of Business Ethics for Employees (Summary)

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## Introduction

Firstly, welcome to the Company! At CHARLES & KEITH Group, we believe that all employees should be able to work in an environment that reflects professionalism and integrity. With our Code of Business Ethics for Employees, we have established transparent standards of conduct and duties to adhere to at work. All group employees are trained on the Code of Business Ethics for Employees upon joining the company.

CHARLES & KEITH Group is headquartered in Singapore and operates more than 600 stores worldwide under two brands specialising in fashion footwear and accessories – CHARLES & KEITH and PEDRO. Every day, our brands aim to shape fashion for the better through our group mission: Inspiring Fashion

At the CHARLES & KEITH Group, we believe that all employees should be able to work in an environment that reflects professionalism and integrity. With our Code of Business Ethics for Employees, we have established transparent standards of conduct and duties to adhere to at work.

We want to ensure that all employees based in Singapore are provided with clear information regarding the range of policies and procedures when working in the CHARLES & KEITH Group companies. Some policies and procedures, such as those related to grievances and harassment procedures, are primarily designed to protect your rights while others, such as Social Media and IT and Communications Policy, lay down the standards that the Company expects all **employees**, including former employees, to follow at all times. The policies and procedures in this Code of Business Ethics for Employees (Summary) are intended to provide employees with high-level guidelines that apply to employees at all times. In the event of any conflict relating to written contract of employment and offer letter, the policies and procedures in the detailed version of the Code of Business Ethics for Employees (Full-version) shall prevail.

The Code of Business Ethics for Employees is regularly reviewed and updated. The Company's policies and procedures will be reviewed to reflect changes in relevant legislation and in consideration of employee needs, industry and best practices. An up-to-date copy of the Code of Business Ethics for Employees is available for all group employees based in Singapore on the employee portal/company intranet.

If you have any questions about the contents of this Code of Business Ethics for Employees or other policies, please first contact your immediate supervisor, and then the Company's Human Resource Department.

### 1. **Ethical Conduct**

To ensure continued success and sustainability across all markets, business should always be conducted in an ethical manner. It is through the trust established with our various stakeholders that ensures the continued success of our business and employees are expected to behave professionally, and respect confidentiality.

### 2. **Diversity and Inclusion Policy**

CHARLES & KEITH Group recognises its talented and diverse workforce as a key long-term competitive advantage. We are committed to ensuring an inclusive environment for all employees regardless of their age, disability, education, ethnicity, gender identity, national origin, race, religion or sexual orientation. We are committed to a non-discriminatory approach and have clear frameworks for:

- Providing equal opportunity for employment
- Advancements in all of our departments, programs, and worksites
- Accommodations for religion or disabilities

The CHARLES & KEITH Group Diversity and Inclusion Policy is regularly reviewed and updated to ensure alignment with any changes that the business model may undergo. Any grievances, questions or feedback should be directed to the Global HR Department.

### 3. **Harassment Policy**

#### **Harassment and Bullying**

All employees have the right to be treated with respect and dignity, and the Company is committed to the development of positive policies that eliminate all kinds of harassment and bullying. Harassment or bullying at work in any form is unacceptable and will not be permitted or condoned. These include harassment related to:

- Age
- Disability
- Education
- Gender Identity
- National Origin
- Ethnicity and Race
- Religion or Belief
- Sexual Orientation

Questions regarding Ethical Conduct or the Harassment policy should be directed to the Company's Global HR Department.

### 4. **IT and Communications Systems Policy**

The Company's IT and communications systems and all related software "Information Systems", are intended to promote effective communication and working practices within the organisation. As misuse of the Information Systems can damage the business and the Company's reputation, the Company outlines the standards you must observe when using these Information Systems, the circumstances in which the

Company will monitor your use, and the actions the Company will take in respect of breaches of these standards.

Day-to-day responsibility for matters relating to our Information Systems belongs to the IT Department. They will handle requests for assistance relating to this policy and may specify certain standards of equipment or procedures to ensure security and compatibility. This includes:

- Equipment Security and Password
- Data Security
- Emails
- Use of information systems and the internet (personal use, monitoring, and prohibited use)

Questions regarding IT and Communications Systems policy should be directed to the Company's [Global IT Department, at itops@charleskeith.com](mailto:itops@charleskeith.com).

## **5. Social Media Policy**

Whilst the Company recognises the benefits which may be gained from appropriate use of social media, it is also important to be aware that it poses significant risks to the Company. These risks include disclosure of confidential information and intellectual property, damage to the Company's reputation and the risk of legal claims. To minimise these risks, this policy sets out the rules applying to the use of social media covering the following topics:

- Personal use of Social Media at Work
- Business use of Social Media
- Responsible use of Social Media

Questions regarding the content or application of IT and Communication Systems policy, and/or Social Media Policy should be directed to the Company's [Global IT Department itops@charleskeith.com](mailto:itops@charleskeith.com) / [Corporate Communications Department corporate.communications@charleskeith.com](mailto:corporate.communications@charleskeith.com) / [Global HR Department hr-dept@charleskeith.com](mailto:hr-dept@charleskeith.com).

## **6. Data Protection Policy**

The Company believes in the importance of responsible handling of information and the confidentiality of its employees' and other individuals' personal information. All employees should familiarise themselves with the details of the Data Protection Policy, which includes:

- Commitment to Data Security
- Data Protection
- Your Personal Data
- Sensitive Personal Data
- Processing
- The Company's Data Protection Officer
- Disclosure of Information
- Keeping Information Up To Date
- Manual and Computer Systems
- Right to Access Personal Data

The Company has a Data Protection Officer and they have the overall responsibility for data protection issues.

## **7. Public Interest Disclosure (Whistleblowing) Policy**

The Company always conducts its business with the highest standards of integrity and honesty. It expects you to maintain the same standards in everything that you do. You are therefore encouraged to report any wrongdoing by the Company or its employees that fall short of these principles.

Legislation protects employees who report wrongdoing within the workplace. The Company recognises that you may not always feel comfortable about discussing your concerns internally, especially if you believe that the Company itself is responsible for the wrongdoing. This policy will cover:

- When This Policy Should Be Used
- Whistleblowing Procedure
- Confidentiality
- Protection from Detriment
- Proper Reporting
- Concealment of Any of The Above

Questions regarding this policy, and/or any claims should be directed to the Company's Global HR Department/Global Legal Department.

## **8. Anti-Corruption Policy**

The Company is committed to conducting all its business in an honest and ethical manner. It adopts a zero-tolerance approach to bribery and corruption, and is committed to acting professionally, fairly, and with integrity in all business dealings and relationships wherever it operates.

This policy outlines the responsibilities of the Company and those who work for it in relation to the prevention of bribery and corruption. It aims to give guidance and information on recognising and addressing relevant issues including:

- Unlawful Conduct
- Gifts and Hospitality
- Donations
- Prohibited Conduct
- Third Parties
- Facilitation Payments and Kickbacks
- Your Responsibilities
- Record-Keeping
- Reporting Concerns
- Training and Communication
- Enforcement and Responsibility
- Monitoring and Review
- Key Risk Areas

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations, and that all those under the Company's control comply with it.

Questions regarding this policy, and/or any claims should be directed to the Company's Global HR Department/Global Legal Department.

#### **9. Health and Safety Policy**

This policy applies to all employees, agency and casual workers and is intended as a statement of current Company policy and its commitment to provide and maintain safe and healthy working conditions, equipment and systems of work for all employees. The Company is committed to giving equal priority to health, safety and welfare of its employees as to all other aspects of its Company's business and will not sacrifice health and safety to the pursuit of profits. The Company recognises its responsibility for the health and safety of non-employees who may be affected by its activities.

The detailed policy outlines:

- The Company's Commitment to Health and Safety
- Responsibility of Employees and other Workers
- Health and Safety, Driving and Mobile Phones

Day-to-day responsibility for matters relating to our Health and Safety Policies belongs to the Global HR Department/Singapore HQ Building Maintenance Department.