GANNI SUPPLIER CODE OF CONDUCT 2025

INTRODUCTION

To GANNI, when it comes to becoming a more responsible company, being honest is more important than being perfect. We want to be open about our commitment to more responsible business practices and strive to improve every day. As a fashion brand, we view it as our moral obligation. We take a holistic approach, looking at everything we can from the materials we source and the partners we work with to what impact our production has on the environment.

Our Code of Conduct (CoC) underpins the 'way we do business'. It is based on international regulations set by the International Labour Organization (ILO), the UN Universal Declaration of Human Rights, including the Code of Labour Practice used by Fair Wear Foundation (FWF), and the UN Guiding Principles on Business and Human Rights.

The purpose of this CoC is to ensure an ethical and fair business of all parties, people and animals involved. We believe that a strong focus and continuous improvement of an ethical business and compliance to the principles below will ultimately benefit all parties and countries - both economically and socially.

GANNI expects that all suppliers and their subcontractors sign and comply with this Code of Conduct and that when necessary it will be translated into the national language by the supplier and communicated with employees in a way that the supplier deems fit and reasonable. In addition to meeting the requirements put forward in this CoC, we expect that our suppliers comply with all national/regional laws, administrative practices, and standards in the country they operate.

We aim to operate with an open dialogue between GANNI and its suppliers to improve the economic, environmental and social situation to better the fashion industry as a whole.

TRANSPARENCY

Transparency is a fundamental part of our business relationship and the core of sustainability work. We expect our suppliers to be transparent with us on their ability to adhere to our policies, standards in relation to this Code of Conduct. In addition, supply chain traceability is imperative to improve social and environmental practices.

As such:

- We require all our suppliers to be transparent about the production facilities we are linked to, from material source to final manufacturing.
- Suppliers are expected to provide complete and accurate business records and documentation as mandated by law or for at least 12 months. The act of intentionally hiding, falsifying or altering information for the purposes of deceiving is strictly prohibited.
- The supplier reports the use of any subcontractor and provides the subcontractor's full company name, contact person, and address. The supplier must ensure that subcontractors have taken part of and acknowledge our Code of Conduct and the supplier will be liable if any action is taken in violation of the Code of Conduct. The use of subcontractors must be confirmed by GANNI in writing before starting any production.

ANTI-CORRUPTION

Businesses should work against corruption in all its forms, including extortion and bribery. GANNI prohibits all employees, or anyone associated with them from offering, promising, giving, soliciting or accepting any bribe. This is communicated to all GANNI staff through our employee handbook and Code of Ethics and to our suppliers through this Code of Conduct. This means that suppliers cannot offer gifts or other similar items to any GANNI employees in exchange for favours. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships wherever we operate.

PEOPLE

To promote human rights across our direct and indirect business operations, we require our suppliers and extended supply chain to comply with our Principles. The national laws of the supplier and of subcontractors must be complied with at all times that is being warranted by the suppliers. In situations where the framework would turn out to be in violation with mandatory national laws of the supplier and the subcontractors the national law applied by the supplier must immediately inform GANNI hereof in writing. This applies to all the principles and sections.

EMPLOYMENT IS FREELY CHOSEN[1]

GANNI supports the UK's Modern Slavery Act in eradicating forced labour and human trafficking. We are committed to respect human rights and work to combat any kind of modern slavery. There shall be no use of force, including bonded or prison labour. The supplier warrants that no part of the labour force or people involved at the working place of the supplier and subcontractors or in other parts of the production line are subjected to forced and compulsory labour. More detail is described in GANNI's Involuntary Worker Policy (Appendix 01).
GANNI supports the development of an open and robust labour market, however, GANNI is aware that migrant workers can be vulnerable to unfair working conditions, exploitation and forced labour. To further address this issue, GANNI's Migrant Worker Policy (Appendix 02), outlines how GANNI expects its suppliers to treat migrant workers in their own operation and throughout the supply chain.

THERE IS NO DISCRIMINATION IN EMPLOYMENT[2]

Every employee is treated with respect and dignity at all times. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement on the grounds of gender or sexual orientation, race, color, age, pregnancy, marital status, religion, political opinion, union membership, nationality, ethnic origin, social origin, disease or disability.

NO EXPLOITATION OF CHILD LABOUR[3]

There shall be no use of child labour. Employees at the suppliers and their subcontractors must be at least 15 years old or over the age required for completion of compulsory education in the country of manufacture, whichever is higher. Juvenile Workers, who are older than the applicable legal minimum age but are younger than 18 years of age, must be protected with special consideration, pertaining to working hours, work type and working conditions, and shall not perform work which, by its nature or the

[1] ILO Conventions 29 and 105
[2] ILO Conventions 100 and 111
[3] ILO Convention 138 and 182

circumstances in which it is carried out, is likely to harm their health, safety or morals. More detailed is described in GANNI's Child Labour Policy (Appendix 03).

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING[4]

The supplier must acknowledge and uphold the freedom of association and the right to collective bargaining. Employees should be free to form and join organisations of their choice.

When the right to freedom of association and collective bargaining is restricted under law, the employer must not hinder other forms of collective bargaining and workers' organisations. Workers' representatives must not be discriminated against and must have access to all workplaces necessary, to carry out their role[5].

Employees should not be subjected to punishment, intimidation or harassment due to the exercise of their right to join or to refrain from joining any organisation, or due to their union activities.

PAYMENT OF A LIVING WAGE[6]

Wages and benefits paid for a standard working week shall meet, at a minimum, national legal level, or collective bargaining agreement, whichever is higher. In any event, a fair living wage should always be sufficient to meet the basic needs of employees and their families, and provide some discretionary income. All fringe benefits required by law or contract are provided.

No deductions from wages for disciplinary measures can be permitted. Deductions shall never constitute an amount that will lead the employee to receive less than the minimum wage. All workers must prior employment be provided with written and easy information about the conditions in respect of wages for the pay period.

WORKING HOURS[7]

Working hours in a week, and overtime hours shall comply with national laws or collective agreement, whichever provides greater protection for workers. No worker shall work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period. Overtime shall be voluntary and shall not exceed 12 hours per week, shall not be demanded on a regular basis and overtime pay shall always be compensated at a premium rate, in accordance with the law.

SAFE AND HEALTHY WORKING CONDITIONS[8]

Employee safety is top priority. The supplier and their subcontractors must provide a safe and hygienic working environment and bring about conditions free from risk of injury or threat to the health and well-being of workers. Best occupational health and safety practice shall be promoted, bearing in mind the prevailing knowledge of the industry and of any specific hazards.

We expect our supplier and their subcontractors to implement effective regulations, procedures and trainings, to prevent accidents and minimise health risks as much as possible.

[4] ILO Conventions 87 and 98
[5] ILO Convention 135 and Recommendation 143
[6] ILO Conventions 26 and 131
[7] ILO Convention 1
[8] ILO Convention 155

NO HARSH OR INHUMANE TREATMENT[9]

Every employee is treated with respect and dignity at all times. Physical abuse, threats of physical abuse, unusual punishments, sexual and other forms of intimidation shall be strictly prohibited.

LEGALLY-BINDING EMPLOYMENT RELATIONSHIP

There should be a legally binding employment contract. Every worker should get a written contract and all legal social security charges should be paid stated in the contract. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

[9] ILO Convention 190

ENVIRONMENT

Our suppliers and their subcontractors must comply with all relevant local and national environmental protection laws and regulations and aim to meet international environmental protection standards, particularly with respect to water, energy, hazardous chemicals, air emissions, and waste.

SUPPLY CHAIN DECARBONISATION

GANNI has committed to reducing its absolute emissions across scopes 1, 2, and 3 by 50% by 2027, against its 2021 baseline. To track progress, GANNI conducts annual data collection and calculates its corporate carbon footprint. This includes gathering energy usage data directly from its contractual suppliers and across the wider supply chain down to raw material, to better capture emissions at various stages of production.

We expect our suppliers to go beyond compliance by continuously improving energy efficiency in buildings, production processes, and transportation. Suppliers should make reasonable efforts to use renewable or lower-carbon energy sources and are expected to maintain ongoing dialogue with GANNI about future plans for transitioning to renewable energy. Simultaneously, GANNI has committed to progressively phasing out coal use in its supply chain, with the goal of completely eradicating it among Tier 1 and Tier 2 suppliers. Suppliers are therefore expected to engage in ongoing dialogue about their plans to remove coal from operations. Where needed, GANNI will work closely with suppliers to support their progress toward these goals.

Contractual suppliers are therefore required to indicate whether any energy is generated from on-site renewable sources (e.g., solar panels) and disclose any use of coal-fired machinery or operations. GANNI may also request specific details on the types of energy used for electricity and heating, along with annual consumption data (kWh). This requirement applies to both the supplier's own facilities and those of their supply chain partners.

EU REACH STANDARD

We require all our suppliers, whether production is placed outside or inside Europe, to comply with the European legislation and regulations of chemicals. All suppliers must sign and adhere to our Restricted Substance List (RSL) which is based on the European chemical legislation REACH and the AFIRM RSL. Suppliers are to adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances including labelling laws and regulations for recycling and disposal.

PREFERRED MATERIALS

GANNI defines preferred materials according to GANNI Fabric Score, which is available upon request. We expect our suppliers to provide supportive documentation and certifications.

The use of material originating from animals must be sourced with respect to the animal and the environment. We expect our supply partners to abide by the Five Freedoms, more details are specified in GANNI's Animal Welfare Policy (Appendix 04).

MONITORING AND EVALUATION

To ensure that the Code of Conduct is followed, GANNI reserves the right to, at any time, send representatives or external auditors to inspect the supplier and subcontractors. The supplier warrants that GANNI and/or its representatives can at all times announced, semi-announced or unannounced be given full access to the premises (including relevant documents) and surroundings of the supplier and subcontractors.

If the Code of Conduct is not followed, the condition must be improved. Violations of the Code of Conduct which are found at subcontractors must be remediated to the same standards as direct suppliers. GANNI will engage with the supplier to identify the root cause and set an action plan to implement the needed improvements. GANNI is dedicated to supporting the supplier's continuous improvement. GANNI will participate in remediation, in collaboration with other buyers as appropriate, and in proportion to its responsibility for the adverse impact. However, non-improvement of conditions can be grounds for discontinuation of our collaboration and termination of any contracts with the supplier.

GANNI - CODE OF CONDUCT

The undersigned hereby confirms that:

As a supplier of GANNI, I commit to having read GANNI Code of Conduct and all applicable Appendices and accept the terms required of us as a supplier and of our subcontractors. We confirm that we will oblige to the internationally agreed standards for responsible business behaviour as formulated by the International Labour Organisation (ILO), the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. We confirm that we will keep an honest and transparent business relationship with mutual respect and understanding. We also understand that continuous non-compliance to the principles will force GANNI to withdraw from the business relationship.

In case of discrepancies, we as suppliers will inform GANNI and suggest corrective actions immediately, to avoid hindering the usual business process.