

OUR FAIRNESS WITH EACH OTHER

CODE OF CONDUCT

fashionette AG

TAKING RESPONSIBILITY TOGETHER

Dear Colleagues,

Acting with integrity and cultivating business relationships based on an established compass of values are absolute necessities on the path to sustainable growth in a competitive world.

The success of the fashionette AG is built on the high degree of professionalism and your passionate commitment. It is reflected in the way we conduct our business. Our reputation as an ethically responsible organization is one of our greatest strengths and assets. It is up to us to protect and preserve this reputation.

In a world that is growing closer together and seems to be turning ever faster due to the increasing pace of globalization and digitization, we must be aware of our responsibility and be prepared to live up to it. One of the challenges we face is to meet the constantly and rapidly changing legal requirements. Our Code of Conduct ("CoC") is intended to help us respond to

ethical and legal issues in our daily work and to serve as a guide in case of conflicts and dilemmas. However, it is impossible to address every situation in such a code and make conclusive recommendations for action. Therefore, each and every one of our employees is encouraged to take personal responsibility as an ambassador of the fashionette AG and to act at all times in accordance with legal regulations and our CoC. If you have any doubts, questions or suggestions, please contact your manager at any time and of course please also contact us.

Düsseldorf, March 1st, 2023

Dr. Dominik Benner



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1

PREAMBLE

1 – PREAMBLE

The CoC forms the basis of our compliance program and provides us with guidance on how to conduct our business in accordance with our values and applicable laws and regulations.

Our CoC applies to all corporate bodies and employees of the fashionette AG as well as its affiliated companies.

It is structured in five subject areas:

- Integrity of our business conduct
- Integrity of our conduct with each other
- Integrity of our social actions
- Integrity in the handling of information
- Integrity in dealing with company assets

Each of the five chapters builds on the values of the fashionette AG and summarizes the essential principles and rules that govern our actions and our business activities. Our values describe our identity, our character and are our mission statement:

- Integrity
- Equal Rights
- Accountability
- Mutual respect
- Transparency



2

INTEGRITY OF OUR BUSINESS CONDUCT

2 – INTEGRITY OF OUR BUSINESS CONDUCT

COMPLIANCE WITH LAWS AND GUIDELINES

Each of us is obligated to observe the applicable laws and regulations, the internal company guidelines, instructions and directives including this CoC and to act accordingly.

Any deviating behavior or instructions that lead to a violation of the above rules will not be tolerated, are prohibited and will result in appropriate sanctions.

CONFLICTS OF INTEREST

To protect the reputation of the fashionette AG, we must ensure that our relationships with third parties are flawless. Private interests and the interests of the fashionette AG must be kept strictly separate. Therefore, we must avoid situations that could lead to a conflict between our personal interests and the interests of the fashionette AG. Even the appearance of a conflict of interests must be avoided. In contacts with current or future stakeholders such as colleagues, employees, customers, suppliers, clients and competitors you must act in the best interest of the fashionette AG and exclude any personal advantage. This also applies to relationships with relatives or other close persons or organizations. Conflicts of interest can be resolved by disclosing them in writing to your superior, the Compliance Officers and the Board of Directors. The prerequisite for this is always the transparent disclosure of the conflict. Further details on this topic "Conflicts of Interest" can be found in our Dos & Don'ts.

2 – INTEGRITY OF OUR BUSINESS CONDUCT

ANTICORRUPTION

The fashionette AG accepts and tolerates no form of corruption or illicit influence peddling. We are committed to complying with applicable laws against corruption, including, but not limited to bribery and corruption, fraud, embezzlement, tax evasion and falsification of documents.

This means among other things that you may not offer, pay or accept bribes or kickbacks, either directly or through third parties. It is also prohibited to pay bribes or allow others to pay bribes on behalf of the fashionette AG. Please pay special attention to gifts and hospitality. These must always be within the scope of the usual polite business dealings. They must never influence or even appear to influence a business decision.

Thus, before making a gift or issuing or accepting an invitation, make sure that the value is within a reasonable range and cannot be considered as illicit influence peddling on a business decision. Any gifts and hospitality in relation to public officials or governmental organizations are strictly prohibited. If you have any doubts about gifts and hospitality, please contact your supervisor or the Compliance Officers. Further details on the topic of “Anti-Corruption” can be found in our Dos & Don’ts.

2 – INTEGRITY OF OUR BUSINESS CONDUCT

MONEY LAUNDERING

The fashionette AG complies with the legal obligations for money laundering prevention and does not participate in money laundering activities. No employee may, alone or with others, commit acts that violate the regulations prohibiting money laundering. In the event of unusual financial transactions, in particular including cash, which may give rise to suspicion of money laundering or other doubts about the permissibility of transactions, you are obligated to involve the Board of Directors or the Finance Department at an early stage and to have this checked.

FAIR COMPETITION

The fashionette AG is fully committed to fair competition and compliance with the applicable antitrust and competition laws. Violations will not be tolerated and will result in sanctions.

Thus, not only the explicit agreement, but also a coordinated behavior of companies is prohibited. This is the case, for example, when companies coordinate their market behavior based on a common will. When participating in associations and interest groups, strict adherence to the above rules must be ensured. You must avoid even the appearance of any anti-competitive behavior.

Since the legal evaluation can be difficult in individual cases, please contact the superior, the Compliance Officers and the Board of Directors in cases of doubt. You can find further details on the topic of "Fair Competition" in our Dos & Don'ts.



3

INTEGRITY OF OUR
CONDUCT WITH EACH OTHER

3 – INTEGRITY OF OUR CONDUCT WITH EACH OTHER

MUTUAL RESPECT, NO TOLERANCE OF DISCRIMINATION

Our interaction with colleagues, employees, customers, business partners and other external stakeholders must be governed by respect and appreciation. No one may be discriminated against or disadvantaged on the basis of nationality, ethnic origin, race, skin color, sexual identity, religion, ideology or disability, or on the basis of gender or age. The fashionette AG promotes a culture of equal opportunities and respects the structures, customs and traditions of other cultures.

HUMAN RIGHTS, CHILD AND FORCED LABOR

The fashionette AG is committed to complying with internationally recognized human rights and rejects any form of child and forced labor.

EMPLOYEE RIGHTS

The fashionette AG recognizes the right of all employees to form trade unions and employee organizations on a democratic basis within the framework of internal state regulations and local customs. Remuneration and other benefits should at least correspond to the respective national and local legal standards or the level of the national economic sectors/industries and regions.

OCCUPATIONAL SAFETY AND HEALTH PROTECTION

The fashionette AG is responsible for the protection of our employees and for a responsible use of natural resources. Each one of us is obligated to promote safety and health protection in his or her working environment and observes the regulations for occupational health and safety. Every manager is required to instruct and support employees in fulfilling this responsibility.



4

INTEGRITY OF OUR
SOCIAL ACTIONS

4 – INTEGRITY OF OUR SOCIAL ACTIONS

ENVIRONMENTAL, CLIMATE, ANIMAL AND SPECIES PROTECTION

The fashionette AG understands itself as part of the societies in which we do business. Every employee recognizes our responsibility to treat natural resources carefully and to contribute by his or her individual behavior to the protection of the environment, the climate and flora and fauna. In accordance with the sourcing policy, the fashionette AG commits itself and its business partners to respect the protection of species and condemns the illegal trade with endangered animal and plant species. We reject animal experiments for the development of new products or materials as well as animal breeding and husbandry methods that are not appropriate to the species.

DONATIONS AND SPONSORING

The fashionette AG is a member of the society and is active in the social and community environment. All contributions are made solely in the interest of the company and serve no other purposes. They may neither convey the impression of influence nor be suitable to damage the reputation of fashionette or our employees. They may not be misused for corruption purposes. Corporate donations for political purposes or political parties, related institutions, politicians or candidates for political office will not be made. Contrary to donations, sponsoring contributions are made in return for contribution. They require the conclusion of a sponsoring contract, which must be approved by the Board of Directors.

4 – INTEGRITY OF OUR SOCIAL ACTIONS

MEDIA AND PUBLIC

Our business has an impact on many stakeholders in the societies in which we operate. We must therefore ensure that our communication and marketing activities are in line with our ethical and social values and reflect these in every situation. This also means that we do not sell products on our platform that glorify discriminatory, pornographic or politically extreme views or actions or that are provided with corresponding images, nor do we use or promote them in any other way.

Statements for the fashionette AG, in particular in relation to media and in social networks, may only be made by the persons authorized by the Board of Directors.

With regard to behavior in social media, such as Facebook as well as Internet forums or blogs, we must ensure that the fashionette AG, our business operations, colleagues and employees, partners and customers are treated with respect. If someone is identified or can be identified as an employee of the fashionette AG, he/she must make it clear that the contribution reflects his/her personal view and not those of the fashionette AG. Any statement in public that is damaging to business or reputation is prohibited.



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INTEGRITY IN THE HANDLING
OF INFORMATION

5 – INTEGRITY IN THE HANDLING OF INFORMATION

REPORTING

Transparent and accurate reporting as well as communication about business transactions of the fashionette AG is of utmost importance for us. You will ensure that the information provided in our internal and external business records is accurate, comprehensive, appropriate, understandable and appropriate in terms of time and system.

INFORMATION SECURITY AND DATA PROTECTION

You are obligated to use the electronic information systems in compliance with the legal regulations and the company's internal guidelines and instructions and to observe the security precautions and security procedures available (in particular encryption and passwords). The storage of business data on private media is generally prohibited.

Personal data is to be treated confidentially and may only be collected, processed and used within the framework of the relevant data protection regulations.

5 – INTEGRITY IN THE HANDLING OF INFORMATION

HANDLING OF CONFIDENTIAL INFORMATION

All employees are obligated to maintain secrecy about all internal matters and confidential information of the fashionette AG, including confidential information of customers, suppliers and business partners.

You will protect the confidential information at all times, unless the disclosure is expressly approved by your supervisor. This also applies to colleagues. The disclosure of confidential information to other employees is only permitted on a strict need-to-know basis. You can find further details on the subject of “Handling of Confidential Information” in our Dos & Don’ts.

INSIDER TRADING

The fashionette AG is a listed company and is therefore subject to capital market regulations. Employees who, due to their affiliation with the fashionette AG, learn of confidential information not intended for the public or have concrete information about circumstances not known to the public which could influence the stock exchange or market price of financial instruments (“Insider Information”) of the fashionette AG, may not use this information neither for the direct nor indirect acquisition of a personal advantage when buying or selling shares or other financial instruments of the fashionette AG or pass on this information, regardless of whether the communication of the insider information is intentional or grossly neglecting the necessary care. Further details are regulated by our Insider Policy.

A high-angle, soft-focus photograph of a white ceramic coffee cup filled with a golden-brown beverage, sitting on a white saucer. In the foreground, a folded, light brown leather wallet with a gold-colored metal clasp is visible. The background shows a grey upholstered chair with a wooden leg. A white rectangular box is overlaid in the center, containing the number 6 and the title text.

6

INTEGRITY IN DEALING WITH COMPANY ASSETS

6 – INTEGRITY IN DEALING WITH COMPANY ASSETS

PROTECTION OF ASSETS AND COMPETITION RELEVANT INFORMATION

All employees are responsible within their field of activity for protecting tangible and intangible assets of the fashionette AG from loss, damage or theft. Any conduct that is likely to damage the reputation and image of the fashionette AG is prohibited. The intellectual property of others must be respected. Further details on the topic of “Protection of Assets and Competitive Information” can be found in our Dos & Don’ts.

USE OF COMPANY PROPERTY

Facilities, equipment and other company property may not be used for your private purposes, unless private use is expressly and provably permitted.



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IMPLEMENTATION AND
CONTACTS

7 – IMPLEMENTATION AND CONTACTS

This CoC provides guidance, but cannot conclusively address every doubtful or problematic individual case or provide a simple answer in complex situations. The Board of Directors, the managers and also the Compliance Officers of the fashionette AG are readily available as contact persons. You can reach our Compliance Officers at compliance@fashionette.com.

Please note that violations of the law, this CoC and the internal guidelines and instructions will be sanctioned with warnings, claims for damages or termination of employment or other appropriate sanctions. Superiors may also be held responsible if they fail to detect such violations in their area or to follow up such violations diligently and responsibly.

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