



SUSTAINABLE FOR TOMORROW.

POLICY STATEMENT

INSPIRED BY YOUR JOB.



POLICY STATEMENT

INTRODUCTION - EINLEITUNG

We, the company Paul H. Kübler Bekleidungswerk GmbH & Co. KG, are committed to our social responsibility. Driven by our responsible awareness of the social, ecological and economic design of the entire value chain, we are facing up to the challenges of an increasingly networked and global economy. Our corporate mission statement is family-oriented, open, honest and respectful, and is based on our values of VALUABILITY, DEVELOPMENT, SAFETY and RESPONSIBILITY.

Regarding our values, we especially base our compliance according to following internationally recognized standards:

- The Sustainable Development Goals (SDGs) of the United Nations
- The UN Guiding Principles on Business and Human Rights
- The ILO core labor standards
- The United Nations Convention on the Rights of the Child
- The OECD Guidelines for Multinational Enterprises

Furthermore, we are member of the GERMAN-FASHION MODEVERBAND DEUTSCHLAND E.V., and comply according to their Code of Conduct. As a member of MAXTEX, we engage in developing sustainable solutions within our value chain.

RISK ANALYSIS - RISIKOANALYSE

A supply chain can often span several continents and cultures. Potential changes in some areas can therefore have a rapid impact on the entire value chain. In order to meet the constant demands placed on society and ourselves, we therefore carry out a comprehensive risk analysis. In this analysis, we identified the following most serious risks: Discrimination | Working hours & excessive overtime | Child and forced labor | Freedom of association | Living wage | Hazardous chemicals | Water consumption & water pollution | Greenhouse gas emissions | Corruption and bribery. We are aware that external circumstances and changing business activities can influence individual risks. Our aim is to constantly fulfill our due diligence obligations. In order to continuously develop our business practices, it is therefore necessary to continually review and update the risk analysis and the resulting measures.

ENVIRONMENT - UMWELT

We are aware of our responsibility towards society and the environment and are convinced that we can only be successful in the future if we take this awareness into account in all our actions. The protection of people and natural resources is particularly important to us. We are therefore committed to protecting the environment, preventing environmental pollution and the continuous improvement of our quality and environmental management system. Our aim is to implement the requirements of the ZDHC. We regard compliance with the requirements and binding obligations placed on us as a matter of course.

We have already laid out important foundations for sustainable management.

Since 2015, we have been living a CODE OF CONDUCT, we are DIN EN ISO 9001:2015 and DIN EN ISO 14001:2015 certified by TÜV Rheinland and fulfill the STANDARD 100 by OEKO-TEX® with almost all our products.

When developing our collections, we always focus on the client, true to the motto "INSPIRED by your Job".

In addition to the safety and quality aspects, the recycling concept is becoming increasingly important. We aim to continuously increase the proportion of sustainable materials in the coming years, provided that this goes hand in hand with consistent quality and resilience of the materials. Thanks to the durability of our products and the standard-compliant repair options, we help to keep raw materials in use for as long as possible.

We are in constant communication with our partners in the textile industry about recycling options and the end-of-life stage of our products and want to develop and implement solutions together.

This paragraph is supplemented by our **Environmental Policy**.

SOCIAL – SOZIALES

In addition to ecological aspects, a responsible approach to social issues is a fundamental part of our principles. The focus here is on **RESPECT FOR HUMAN RIGHTS**.

Creating and maintaining a humane working environment is a top priority for us at KÜBLER.

Through our activities, we avoid infringing on the fundamental rights of others and are committed to enforcing and improving fundamental rights, labor, social and environmental standards in economic value creation processes. In doing so, we are guided by the internationally recognized principles as expressed in the United Nations Universal Declaration of Human Rights, the ILO core labor standards, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Relevant topics here are:

- **PROHIBITION OF CHILD- AND FORCED LABOR**
- **PROTECTION FROM DISCRIMINATION, MARGINALIZATION AND DISADVANTAGES**
- **PROTECTION OF HEALTH AND WELLBEING**
- **FAIR WORKING HOURS AND ADEQUATE REMUNERATION**
- **SUPPORT OF COLLECTIVE BARGAINING**
- **PROTECTION OF VULNERABLE GROUPS AND THEIR RIGHTS**
- **PROTECTION OF PERSONAL DATA**

More details are elaborated within our **Human Rights Policy**.

We maintain close contact with our suppliers to fulfill our duty of care as a company with regard to human rights. In doing so, we ensure that the measures to fulfill our corporate due diligence obligations, e.g. by raising awareness among our employees on site and by providing a suitable, accessible complaints channel.

Translations of our Code of Conduct and our Declaration of Principles make it easier to communicate the requirements they contain. By systematically and regularly analyzing and identifying risks, we pursue our goal of reducing and avoiding negative impacts on people and the environment.

COMMITMENT TO THE PROMOTION OF LIVING WAGES

As we recognize living wages as a human right, we are constantly reviewing the standards in the countries concerned in accordance with the specifications of our certification partners. We try to obtain an overview of current wage levels by collecting evidence of wages actually paid to compare them with recognized published reference values.

The aim is to develop solutions together with our partners and suppliers through a trust-based exchange to promote living wages and prevent financial exploitation of employees along our supply chain. Fair and transparent interactions from both sides lay the foundation for any future success.

COMMITMENT TO RESPONSIBLE SOURCING AND PURCHASING PRACTICES

We are committed to responsible procurement and purchasing practices along our value chain. Through forward-looking action and continuous communication, we promote an open business relationship and planning security on both sides.

Within the framework of our contracts and guidelines, we commit ourselves and our business partners to complying with and requirements in compliance with legislative regulations, the Code of Conduct and the ILO conventions. Regular auditing, such as BSCI, is a mandatory minimum requirement for our production facilities. To evaluate risks, we consider various aspects of countries, from our suppliers and our own business activities, procurement and purchasing practices. In doing so, we are guided by the UN Guiding Principles and the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment Industry.

Fair labor and trade relations, long-term cooperation and a continuous exchange with our production companies, other business production facilities, other business partners and our customers is essential for our actions. We visit our production facilities regularly. Our Code of Conduct is accepted and signed by our producers and displayed in their production facilities so that employees are informed. They can contact us directly if they have any complaints.

In order to further prevent and mitigate risks, we keep reports on social audits of our suppliers. (e.g. BSCI reports). In the event of non-conformities with our requirements, we work with the suppliers to develop corrective measures, the implementation of which we promote and monitor. We also create incentives for our suppliers and production facilities by sharing the costs of audits.

Subcontracting with our suppliers is only permitted after prior consultation and in compliance with the defined principles. Here, too, we strive for the best possible transparency.

In the event of repeated violations of the OECD Guidelines or the ILO core labor standards and unsuccessful measures, a responsible termination of the business relationship is defined.

GOVERNANCE - UNTERNEHMENSFÜHRUNG

COMPLAINTS MECHANISM

Concerns regarding the successful implementation of our Code of Conduct as well as any violations of legal and our values and requirements must be reported to us immediately by our business partners and their employees. Depending on the business area, internal and external persons can use various complaint channels to report human rights or environmental risks or violations in their own area or the value chain:

- All affected parties in our value chain by email to: social@kuebler.eu
- Via the complaints channel of our industry initiative AMFORI BSCI: online complaints form <https://www.amfori.org/content/amfori-external-grievance-mechanism>
- Whistleblower system for our own employees, among others: hinweisgeber@schmid-frank.de

Those affected can speak to their line manager or a person of trust at any time without fear of consequences. All complaints received are investigated and processed by impartial and trained employees who are not bound by instructions. Independent specialists are involved in the investigation. Our complaints mechanism ensures that complaints can be submitted and processed anonymously, so that those potentially affected are protected from retaliation.

Together with the relevant specialist departments, an action plan is drawn up with the aim of clarifying the complaint and remedying any human rights violations without delay. We are committed to resolving every complaint together with the perpetrators and those affected and severity and to agree on compensation. The results are subsequently incorporated into our risk analysis, our action plan (e.g. training) for human rights and the environment and our business processes with the aim of preventing further violations.

To ensure compliance with the GDPR, all employees are informed about the associated rights and obligations within the company and sensitized to the correct handling of personal data.

New employees receive extensive training. Corresponding documents and requirements are updated in accordance with the current legal situation and communicated via a newsletter.

SUSTAINABILITY REPORT

We communicate measurements regarding our due diligence publicly on our website. This includes progress within our company, as well as areas of our value chain and strategic partners.

IMPLEMENTATION AND ENFORCEMENT

We communicate the contents of the policy statement publicly on our website. It is posted on the noticeboard for our employees and sent to our partners in writing by post or electronically. It should be clear to all stakeholders that basic compliance with the declaration is guaranteed.

We observe the declaration of principles in our own actions and expect our business partners to apply it accordingly. We support our partners in shaping their supply chains in such a way that human and employee rights are respected and working conditions are continuously improved.

In the spirit of good corporate governance, we embed the principles of responsible corporate management in our strategic and operational management systems. We have created staff positions for digitalization and sustainability within the company to ensure corporate due diligence.

Responsibility for the implementation of and compliance with this declaration lies with the management of Paul H. Kübler Bekleidungswerk GmbH & Co.KG

Plüderhausen, 01.04.2025

A handwritten signature in black ink, appearing to read 'R. Scheiner', with a long horizontal stroke extending to the right.

Richard Scheiner
CEO

Signature supplier



Paul H. Kübler
Bekleidungswerk GmbH & Co. KG
Jakob-Schüle-Str. 11-25
D-73655 Plüderhausen

Fon +49 7181 80 03-0
Fax +49 7181 80 03-31

info@kuebler.eu
www.kuebler.eu

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