

# S.OLIVER GROUP

## Grievance Policy

The s.Oliver Social, Environmental and Ethical Code of Conduct (Code of Conduct) which has relevance for all our sourcing markets requires vendors to implement and operate an effective internal grievance system and to take appropriate corrective measures. At the same time, s.Oliver is aware that grievances cannot always be addressed, handled or solved on a local level, either because local mechanisms still do not exist, they are not implemented properly or because workers fear retaliation. s.Oliver, conducting our business in compliance with good governance standards, recognizes the importance to gain first-hand knowledge about circumstances in our supply chain with the potential to compromise the company's basic ethical principles, integrity and financial security. In line with international standards and frameworks such as United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, we therefore established and provide an access to remedy for workers. We constituted an easily accessible, confidential and open grievance system for everyone in our supply chain wanting to reveal adverse human rights impacts and provable allegations about unethical dealings infringing s.Oliver's ethical standards as expressed in our Code of Conduct.

We have established an internal as well as an external mechanism to send us complaints anonymously. Fair Wear Foundation's (FWF) industry-wide grievance mechanism enables workers and affected individuals, as well as unions and civil society organizations, to report violations anonymously. Special FWF hotlines are used for certain procurement countries, which are communicated individually to the employees of the respective suppliers. The complaints received are processed in close cooperation between the Global Sustainability department of the s.Oliver Group and the FWF. The policy of the FWF can be found [here](#).

### **Scope**

This Grievance Policy applies to all countries in which s.Oliver conducts direct or indirect business through its buying and sourcing activities. It comprises all situations in which persons within our supply chain want to express a serious individual and specific complaint about any actual or bona fide alleged misconduct regarding the principles of our Code of Conduct. It does not establish a public communication line for stakeholders on general issues or for non-confidential complaints. The grievance channel enables confidential reporting on actual bona fide information as individuals may

know and for understandable reason do not want to divulge openly or in other existing reporting lines or grievance systems. It also comprises anonymously provided information which is treated confidential but cautiously safeguarding the rights of any third party concerned. s.Oliver does not encourage or accept any denunciation of individuals and will take appropriate protective measures.

## **Grievance System**

The grievance system is set-up, implemented and operated in a way that the identity of the reporting complainant and the confidentiality of the information provided is protected. Any complaint will get first feedback about the receipt of the complaint within 7 days and feedback on any measures taken within 3 months from receipt of the complaint. s.Oliver has set up a robust and confidential internal reporting structure with a direct reporting line to senior management, who has been especially bound to confidentiality.

Complaints can be submitted through any means of communication, including email to the following address: [complaints@fairwear.org](mailto:complaints@fairwear.org). In addition, hints can also be submitted via the s.Oliver Group's own complaints procedure at <https://soliver-group.hintbox.eu>.

## **Investigation**

s.Oliver has an internal procedure in place that is applicable in order to investigate and verify the complaint. We may also use professional third parties bound by confidentiality for auditing assistance. All s.Oliver personnel to be necessarily involved will be bound to confidentiality. s.Oliver is entitled to disclose confidential information to the extent that we are obliged to do so by law, a final and enforceable court order or by final and enforceable directives of competent public authorities. The protection of the identity of the complainant and circumstances of contact is a key requirement under this policy to protect the complainant from unwanted identity disclosure. In case the investigation requires the disclosure of the identity, s.Oliver will inform the complainant hereof upfront. The complainant can always withdraw a complaint. The complainant will be made aware that specific information or investigation may lead to indirect individual identification. All reasonable measures will be taken to protect the complainant from retaliation, reprisal or detriment as a consequence of divulging information. In case of anonymous complaints, s.Oliver will not be able to keep the complainant updated regarding the investigation.

## **Remediation**

In case the complaint is classified as valid, s.Oliver will undertake all actions that we regard as appropriate and expedient in our sole discretion to remediate the case. The complainant will be informed hereof.

## Data Protection

All data processed are subjects to European Data protection laws.

## Liability

This policy is set-up in the sole interest of s.Oliver to protect its commercial operations and its Governance and Corporate Responsibility which is based on the principles laid down in the s.Oliver Code of Conduct. It is a voluntary communication structure to deal with external complaints reaching the company. Even though s.Oliver will act in due diligence to pursue the content of this policy, this will be according to its own business standards and best efforts and it does not create any legal obligation or responsibility towards any complainant or other party using the provided communication channel.

## Legal Notice:

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