

# INTERNAL CODE OF CONDUCT & BUSINESS ETHICS

# INTRODUCTION

**BIRGER CHRISTENSEN  
CODE OF CONDUCT &  
BUSINESS ETHICS**

**INTRODUCTION**

Birger Christensen collective is rich of a 150-year-old history in fashion. Created in 1869, the company has been a symbol of excellence in Denmark and internationally. Aiming for the extraordinary, while being respectful and trustworthy partners, are a strong part of our heritage at Birger Christensen.

This policy aligns with the principles and guidelines laid out in the UN Global Compact, the UN Guiding Principles for Business and Human Rights, the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), the Universal Declaration on Human Rights the International Bill on Human Rights, and the ILO fundamental conventions.

**PURPOSE**

The BCC’s Code of conduct & business ethics defines our corporate culture and how we apply it in our actions and words, towards our colleagues but also our business partners and customers. Our intention is to enforce a work culture where each individual feels valued, considered, and respected. In our mission to empower women to change fashion for good, we aim to be a responsible business that enforces ethical, fair and respectful behavior in our everyday practices.

**SCOPE**

This policy applies to the management, employees, and contract workers of Birger Christensen collective and equates to all individuals and communities affected by the company’s own operations. All are responsible for applying these values and behaviours daily, through all our interactions.

# INTERNAL CODE OF CONDUCT

## BIRGER CHRISTENSEN CODE OF CONDUCT & BUSINESS ETHICS

### A. PERSONAL RESPONSIBILITY

We ask all our employees to act according to this code. Failure to do so, can result in disciplinary action, and might resolve in contacting the law enforcement authorities, if applicable.

The same consideration applies to any member of the managing team for their direct actions, as well as for any failure to apply this code or report on its violation.

No employee or manager will be penalized for any loss of business resulting from adherence to the code.

No employee or partner that reports a breach of this Code can be subject to any form of retaliation. We empower all our employees and partners to speak up and use appropriate means to report any infringement. Disclosure is key to a transparent, fair and ethical business practices and we value honesty and collaboration.

If you wish to report any infraction to the code, see more information, in Grievance and whistleblowing

### B. CULTRE & VALUES

**BOLD, COMMITTED, COLLABORATIVE**  
We are the fashion collective empowering women to change fashion for good.  
We identify and nurture transformational ideas and technologies to help them reach their potential faster. We help people blossom and bring their unique self to the team,

so that we, together, can achieve our mission to radically transform fashion.

**Embrace innovation.**  
We foster change. We dare to try new ways and technologies to accelerate our transformation.

**Celebrate people.**  
Each of our stakeholders has a unique voice that we recognize, empower, and celebrate.

**Succeed together.**  
Prosperity can only be achieved by sharing success and responsibilities, and by respecting the people and the planet.

**Those values are not just words.**  
They are the foundation of our purpose, our strategy, and our actions.  
We want those commitments to be shared by all, and we invite each member of the collective to speak up, share ideas and help in our transformative journey.

### C. LABOR RIGHTS & FREEDOM OF ASSOCIATION

Freedom of association and the right to collective bargaining are fully enforced, and employees with no distinction have the right to joint or form trade unions.  
The employees that are part of the Design, Fitting/ Construction or Sourcing team are, in addition, covered by a collective agreement called TL.  
We support the activities of trade unions and will never hinder or interfere with their activities or engage in surveillance on their activities.

Our Health & Safety committee oversees occupational health and safety problems, and its employee representative is freely elected every 2 years by our employees.  
Furthermore, child labor is forbidden in all our activities, in conformance with ILO standards on child labor. Our direct employees that might be under 18, like student helper, shall not be employed at night or in hazardous conditions, and no longer than 8 hours a day.  
Our activity might lead us to employ models that are under 18 for our marketing activities. In conformity with the Danish Fashion Ethical charter that we signed and enforce, our model shall be at least 16 years old. We always partner with local agencies where our shows and events lead us, to hire models in full respect of applicable labor laws and agreements, and to always have contracts written and signed by all parties.

### D. PROTECTION OF HUMAN RIGHTS

**Private relationships**  
Each employee is free to form a couple privately, including with a coworker. We ask employees to disclose any personal relationship with a coworker that might affect the working environment. No couple can refer to each other, and a couple working in the same team might result in the need to separate the pair.  
In general, personal relationships within the company must not lead to favoritism, sharing of confidential and/or business-related information, or any discrimination.

# INTERNAL CODE OF CONDUCT

## BIRGER CHRISTENSEN CODE OF CONDUCT & BUSINESS ETHICS

**Unwanted sexual attention (sexual harassment)**  
 Birger Christensen collective does not accept behavior that can be characterized as unwanted sexual attention or sexual harassment. This is any kind of unwanted verbal, non-verbal or physical behavior with sexual undertones for the purpose or effect of violating a person’s dignity, in particular by creating a threatening, hostile, degrading, humiliating or unpleasant climate. If you are exposed to such unacceptable behavior, you must immediately contact your direct manager. If your own direct manager is perceived as part of the behavior, you must immediately contact HR. See Grievance and whistleblowing for more information.

**Discrimination, bullying, harassment**  
 We do not tolerate any form of discrimination (distinction, exclusion or preference) based on gender, sexual orientation, origin, skin color, disability, age, religion or political beliefs or other visible or alleged particularity. We aim at creating a work environment that celebrates differences, and creative thinking, and that brings opportunities for all, always. Human Resources decisions must be solely based on objective criteria such as performance, qualifications, and experience.  
 To ensure a positive workplace for all, we commit to treating all employees with respect and dignity. No verbal or physical abuse will be tolerated, nor any form of bullying, harassment or threats by any employee, manager, or partner. Bullying and harassment is when any unwanted verbal, non-verbal or physical conduct is exhibited for the purpose or effect of violating that person’s dignity and creating a threatening, hostile, degrading, humiliating or

unpleasant climate.  
 If you are exposed to such unacceptable behavior, you must immediately contact your own direct manager. If your own direct manager is perceived as part of the behavior, you must immediately contact HR.

Our international setting exposes us more to committing and suffering from microaggressions. We recognize that, even though most of those aggressions are not intended as harassment, they can be experienced as such. To ensure a positive environment for all, we commit to providing training and resources to increase a common knowledge and understanding of our bias and involuntary impact on people. We also recommend any employee that has been exposed to such microaggressions to report them the same way as harassment or discrimination case. Those examples help people and the company identify existing issues and provide adequate solutions.

A violation of the said rules will have consequences for the employment.

**Inclusion and diversity**  
 Birger Christensen collective is an open, international, and positive workplace, that promote respectful and inclusive practices and communication.  
 We believe diversity and equity are not only a basic requirement for the well-being and effective work of our employees and stakeholders, but a true chance for our company.

We recognize the importance of monitoring

performance against inclusion, diversity and gender equality, and we commit to tracking and building data anonymously or directly, and to adjust our initiatives according to the results of those inquiries. Our Inclusion & Diversity committee, formed by employees, leads our strategy and internal initiatives.

Through our Supplier Code of conduct, we share the same commitments with our supply chain, and aim at building dedicated programs with them, as we move toward a deeper social and environmental assessment of our all chain of value. If you have suggestions on themes, partners to contact, initiative to join, practical actions to take, please contact HR as we are more than happy to learn from you and build with you.

### E. HUMAN RIGHTS

BCC commits to operating our business consistent with internationally recognized human rights. This commitment applies equally for all persons, regardless of gender and without discrimination. We commit to respect the rights of Indigenous peoples and local communities in all sourcing, consistent with the UN Declaration on the Rights of Indigenous Peoples. We commit to conduct a process of free, prior, and informed consent (FPIC) prior to any activities that might affect the rights of IP/LC and adhere to the outcomes of this process. We commit to respect workers’ rights in all our sourcing (including employees, contractors, temporary, seasonal, part-time, and other workers)

**BIRGER CHRISTENSEN  
CODE OF CONDUCT &  
BUSINESS ETHICS**

consistent with the Conventions of the International Labour Organization (ILO), AFI Definitions and applicable law on workers' rights: no child labour, no forced or compulsory labour, freedom of association and collective bargaining, no discrimination, no abusive practices or undue disciplinary procedures, legal and decent working hours, safe and healthy workplaces, living wages and fair benefits. To do so, we engage in a human right & environmental due diligence prior to onboarding a new supplier and use third party audits to ensure a local and transparent analysis of the situation.

We commit to protecting the rights of environmental and human rights defenders, whistle-blowers, complainants, and community spokespersons.

**F. HEALTH AND SAFETY ORGANIZATION**

Birger Christensen collective ensures the Health and Safety (H&S) of its employees through its Health & Safety organization (HSO) that is composed of the following:

- H&S working group, in charge of enforcing the plan, and addressing daily topics and demands
- H&S committee: in charge of the H&S strategy (planning, development plan, structuring)

You can reach out to any member during working hours, whether we are physically here or working remotely. During holidays, we arrange for one member to be available for the employees' urgent needs.

Every 2 years, an election will take place to elect your new representative. Managers cannot

participate in this election. Students, work leaders, employers and employees working less than 10 hours a week cannot be elected.

Every year we launch an APV (assessment survey) addressed to all employees. It helps us identify issues to tackle and also measure our progress towards previous challenges. At the end of the APV, the HSO edits and releases its annual work environment plan where it presents its main focus areas. Both the APV results and the Annual work environment plan will be fully presented to the team.

**G. FAIR REMUNERATION**

Wages and benefits paid for a standard living working week meet, at a minimum, national legal standards, and shall always be enough to meet basic needs for living.

All contracts provide clear information about the working conditions including wages and social benefits and are provided before employees enter their employment. Pay transfer and the matching pay slip are sent monthly.

Working time is described in each employee's contract, and general good practices on working hours and overtime is fully described earlier in our Handbook.

Student helpers and other employees with limited hours contracts are all employed following Danish laws, and with full transparency on their working hours in their contract and through monthly hours reporting.

Foreign and migrant employees are subject to the same applicable laws as Danish citizens.

Employment contract are always available in English and Danish.

**H. BUSINESS ETHICS**

**Working with third parties**

Our activity leads us to engage in business relationships with a wide network of suppliers and partners internationally. We commit to applying ethical business practices, and to be a good and reliable partner, that show respect, consideration and is capable to listen actively to our partners.

We also expect our partners to live up to our standards and requirements.

Each new supplier is asked to follow our Supplier Code of Conduct and to submit to a due diligence covering various aspects of operations like social & environmental commitments, as well as transparency and regulatory compliance. We ask our suppliers to adhere to our ethical, social and environmental standards, and to apply both their country and international standards of business ethical practices. No business relation with Birger Christensen collective can be initiated without a prior sign-off on our different contracts and policies. Employees managing the direct selection and business relations with our suppliers/partners are responsible for enforcing those requirements and should disclose any issue or noncompliance of a supplier before any order is placed.

# INTERNAL CODE OF CONDUCT

**BIRGER CHRISTENSEN  
CODE OF CONDUCT &  
BUSINESS ETHICS**

**Bribery & corruption**

We are an ethical, honest, and transparent company. We commit to act responsibly and with integrity in all our operations. We have a zero-tolerance policy on bribery and corruption: it is illegal, and it is contrary to our values.

Bribery can be defined as the giving, soliciting, or accepting of an undue advantage or reward that may influence the actions and decisions of people in position of power. Corruption is the result of such action, and the dishonest behavior and decision-making induced.

Bribery is forbidden by law in most countries and can result in severe legal, financial and reputational issues for both Birger Christensen collective and the employee or partner involved.

Bribery can take many shapes: cash but also gifts, access to services or entertainment, meals and hospitality...

All employee of Birger Christensen collective must take extra care before agreeing to any of those:

- only accept or give gifts of modest value, that are appropriate and legitimate, and on rare occasion
- no gift can be given or accepted by procurement, and from/to public officials
- always register any gift and disclose it to your direct management for approval
- refuse gifts that are given in return for or in expectation of a direct/indirect favor
- refuse gifts to family members
- refuse, return when possible, and report any infringement to your manager

Facilitation payments or payments with no deliverables are prohibited by Birger Christensen collective in any case.

If in doubt, please contact your direct manager.

**Conflict of interest**

A conflict of interest can be described as a situation in which an employee can find him/herself in a position to derive personal benefit from actions or decisions of the company.

Conflict of interest occurs with or without an active participation of the person concerned. Hence, every employee at risk, should first avoid any situation of conflict of interest, and when not possible, shall disclose it immediately. Management will then analyze the situation and decide if removing the person from the situation is possible and justified, whether the influence is effective or only perceived.

If the conflict of interest cannot be avoided, management needs to identify and take action to mitigate its impact and prevent a decision to be influenced by the context. Employees are responsible for disclosing such a risk before it might occur. Please seek advice with your manager if in doubt.

On a yearly basis, all board members, executives and employees involved in selecting our suppliers are asked to fill a conflict of interest questionnaire. Based on its results, an action plan will be presented to the board.

**Illegal activities and money laundering**

All employees with a purchase capacity must take extra care in not participating in or financing any illegal activity, that might include money-laundering, terrorist or criminal activity, financial crime...

We ask every employee to be extra careful with any cash payments, request for false invoices or any activity that is outside of general business good practices. Please report them to your manager immediately.

**Political activities & donations**

Birger Christensen collective expresses no political view as a company. If an employee gets involved with a political structure, and/or wants to share political opinions on social media or other channels, it is essential that he/she states that those views are personal and don't reflect a company's opinion. All our company participation in activities and support of NGOs or other structure are made in full transparency, and with no connection to any personal commitment of any of our employee.

**Fair competition**

By law, fair and transparent competition is required in all our markets, as it is key to a just offer for all our customers. Any infringement of the law, in any of our market of sales, might cause strong damages both financially and to the reputation of the company, and will not be tolerated. All employees must take extra care in any communication with both competitors and customers and must assure no ambiguous or wrongful requirement or suggestion is made in the name of Birger Christensen collective. Employees will be held responsible and will face disciplinary issues if such a case is identified:

- Agreement on price, sales conditions, or customer allocation with competitors
- Mandatory resale prices, minimum prices and/or any incentive enforcing a price regulation of our customers

# INTERNAL CODE OF CONDUCT

## BIRGER CHRISTENSEN CODE OF CONDUCT & BUSINESS ETHICS

- Payment or transaction outside of the trade purpose, or without any approbation of a direct manager, that might be identified as wrongful trade influence

### **Forbidden trade**

As an international company, we sell to an extensive number of countries. Some might fall under custom and/or legal restrictions and sanctions over time. We do not allow any employee to trade with sanctioned business entities and countries. Before establishing business partnerships with suppliers or customers, Birger Christensen collective employees must ensure a screening that includes country AND business-based sanction assessment.

### **I. PRODUCT SAFETY AND QUALITY**

Birger Christensen collective is strongly committed to design and produce safe and qualitative clothes, that are compliant with legal standards in each of its sales market. No compromise on the safety and health of our stakeholders can be accepted. All our products are subject to mandatory chemical tests, as a minimum. We work in close partnership with SGS who acts as our international testing partner and help us identify changes in regulations. We ask any employee or partner that is aware of an issue with one of our products to report it immediately to the Head of Buying & Production. We apply a defined procedure to assess the risk level and necessary action plan, to assure our products are safe for all, and eventually recall them if a safety issue is identified. We strictly respect REACH requirements on chemicals and are expanding our certifications to ensure,

from design, safe use and chemical-free products.

### **J. GRIEVANCE AND WHISTLEBLOWING POLICY**

Birger Christensen collective wishes to have an open culture where everyone can come forward freely, express their challenges, and eventually report unacceptable behaviors and/or their reasonable suspicion of irregularities or illegalities in relation to our activities, employees, management, suppliers and the like.

We empower all our employees and partners to speak up and to report any infringement on this code or on the law.

Many concerns, problems or complaints can be solved informally, by engaging with the stakeholders of the issue. If you feel like this is not an option, you can use different entry points in the company: your manager, your AMO representative or your HR. All complaints are taken into account and tracked within the HR department.

Our employee's handbook and our whistleblowing policy describe all applicable cases and processes to take action.

This code cannot cover all specific case that might occur during our operations. If in doubt, please refer to your manager or to HR for advice.

This code will be updated on a regular basis to adjust to future needs for clarification and to answer new challenges of our growing activity. Please share any suggestion you must help us build a document that reflects your work experience and inspires people to better practices.

### **APPROVAL AND IMPLEMENTATION**

This policy is effective upon approval by the Board. All employees are expected to adhere to and support the implementation of this policy.

Signed by: Jens Birger  
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