

It is important for us to take responsibility for all our actions throughout the world. Most importantly we have a responsibility towards every person that takes part in the production of our products. Since we do not own any of the factories where our products are produced, it is important to work closely with our suppliers to regulate factors such as the work environment. We must make sure that no one who contributes to our success is deprived of his or her human rights or suffers any harm. ULLMAX supports and respects the UN's Declaration of Human Rights and the conventions of the International Labour Organization (ILO).

To make our position clear to our suppliers we have set up this Code of Conduct, build upon the ILO Conventions on working conditions and other labor rights. It is a non-negotiable requirement from our side that all our suppliers must follow this code.

1. Human rights

1.1 Legislation

Our suppliers shall follow the national law stated in the country from where they act. All applicable laws and legislations, including the ones related to work, health, security and surroundings, must be followed. No forced labor of any type is permitted.

1.2 No discrimination

No discrimination is permitted. Employees shall have access to work and training in the same conditions, regardless of gender, age, race, skin color, sexual orientation, pregnancy, political opinions, religion, or social identity. Physical harassment and physical oppression are not permitted. (ILO Convention no. 100 and 111)

1.3 No child labor

ULLMAX does not accept child labor. Children under the age of 16, or below the legal school age, may not be hired; the higher of these criteria applies. If relevant national legislation has set a higher age, this age will apply. Young workers shall have the opportunity to participate in training or educational programs. Employees under 18 shall not work at night or under hazardous conditions. Policies and procedures shall conform to the provisions of the relevant ILO standards. (ILO Convention no. 138 and 182)

1.4 Freedom of association and the right to collective bargaining

In accordance with UN's general declaration regarding human rights, suppliers shall respect workers' right to be affiliated with unions and negotiate collectively. Business partners must not threaten or penalize employees for their effort to organize or bargain collectively. Nor may they

discriminate against employees because of any such organizational affiliation. (ILO Convention no. 87 and 98).

2.Security of employment

2.1 Employment

All workers shall be entitled to a written employment contract that contains an accurate, complete and understandable summary of the terms and conditions of employment, including wages, benefits and working conditions.

ULLMAX expects our suppliers to ensure that all employees are aware of their legal rights and obligations.

Workers should be given their stipulated parental leave in case of pregnancy, based on national law. Workers taking parental leave shall be entitled to return to their employment on the same terms and conditions that applied to them prior to taking leave and they shall not be subject to any discrimination, loss of seniority or deduction of wages.

Workers should be granted the stipulated annual leave and sick leave without any negative implications.

ULLMAX expects the suppliers to respect the personal dignity, privacy and rights of each individual and to prohibit any kind of violence and assault at the workplace, including threatening and intimidating behavior and performance of the worker.

2.2 Working hours

The working hours shall follow national legislation. Overtime shall be voluntary and shall be paid for with extra compensation or according to the legal minimum level. National legislation regarding paid leave must be respected. Employees shall have at least 24 hours of uninterrupted time off each week.

2.3 Wages

Wages must be paid directly to the employee on the agreed date and in full. All information about the wages should be available to the employees in a manner that is easy to understand, and the employees have the right to a written specification of how the wage has been calculated. The wage shall be above the legal minimum wage and be more than sufficient to cover basic needs.

3.Working environment

3.1 Health and safety

Ullmax requires from its suppliers that the safety and health of the workers should always be a priority. No hazardous equipment or unsafe buildings are accepted.

The supplier shall provide employees with protective clothing and other safety equipment in accordance with internationally agreed health and safety standards. Safety information shall be made available in a language and in a format understandable to the Employees.

The supplier must provide a sound and safe working environment. Good lightening, heat, air-conditioning/fans and ventilation should be adequate for the proposed work assignments at all times of the working hours. The workers should always have access to clean drinking water. The number of toilets should be sufficient for the numbers of workers working in the plant.

3.2 Fire safety

All factories should have clearly marked exits, and emergency exits on all floors. All exit doors should open outwards. Exits should not be blocked by any items such as cartons, fabric rolls or debris, and should be well lit. If emergency exits are locked, the keys should be placed behind breakable glass next to the doors and thus be always available to staff. All workers should be aware of the safety arrangements in the factory, such as emergency exits, fire extinguishers, first aid equipment, etc. An evacuation plan should be displayed in the factory, and the fire alarm should be tested regularly. Evacuation drills should be performed at least once a year.

3.3 Dormitory

When dormitory facilities are provided, these should meet all applicable laws and regulations related to health and safety, including fire safety and electrical and structural safety.

3.3 Insurance

The supplier shall ensure that the employees are covered by the relevant state or private insurance schemes, covering disablement, injury and pension. Employees injured at work because of some other cause than negligence or disregard of the safety rules must be compensated for loss of income. In those cases where the injury is fatal, compensation shall be awarded to the family.

4.Environment

4.1 Environmental effect

The environment is of increasing concern globally and ULLMAX expects its suppliers to act responsibly in this respect. This includes measures to support sustainable development such as environmental management.

Suppliers must be committed to reducing the environmental impact of their business by adopting best practice principles and continuously seeking improved methods to minimize any adverse environmental impact of their operations, including emissions, resource use and waste. Our suppliers must comply with all applicable environmental laws and regulations within the country of operation.

Except that we want our suppliers to minimize production waste and spill. Water usage shall be monitored, to reduce the total volume of usage. Energy usage should be monitored, and we recommend using renewable energy.

To actively reduce direct and indirect greenhouse gas emissions, suppliers are encouraged to set climate targets.

4.2 Chemical management

All our suppliers are obliged to follow the regulations below:

4.2.1 REACH

ULLMAX is required to comply with the European Chemicals legislation called REACH that is in force since 1st of June 2007. REACH is an abbreviation for Registration, Evaluation, Authorization and restrictions of Chemicals.

ULLMAX require that all our suppliers have the knowledge about REACH and that they follow updated information on the website of the European Chemicals Agency (ECHA), <http://ECHA.europa.eu> that is the European Authority for REACH on behalf of the European Commission.

4.2.2 Stockholm Convention on Persistent Organic Pollutants (POPs)

Stockholm Convention on Persistent Organic Pollutants (<http://chm.pops.int>) is an international environmental treaty, that aims to eliminate or restrict the production and use of persistent organic pollutants (POPs), addressed as the Stockholm Convention, Regulation (EC) 850/2004 <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32004R0850>

4.2.3 Biocidal Product Regulation

The Biocidal Product Regulation (BPR, Regulation (EU) 528/2012, <http://echa.europa.eu/regulations/biocidal-products-regulation/legislation>) concerns the placing on the market and use of biocidal products, which are used to protect humans, animals, materials or articles against harmful organisms, like pests or bacteria, by the action of the active substances contained in the biocidal product.

The Biocidal Products Regulation (BPR) also sets rules for the use of articles treated with, or intentionally incorporating, one or more biocidal products.

5.Ethical conduct in the care and use of animals

5.1 Mulesing-free wool

The origin of the wool must not be sheep that have been subject to mulesing or farms that practice mulesing. All wool used for ULLMAX products should be certified mulesing-free merino wool.

The wool must not originate from sheep that have been plucked or shaved in a manner that has caused the animals to suffer or get harmed. The long-term objective is to promote and enhance traceability in the supply chain as well as to be able to secure humane transportation methods. To succeed, all parties in the supply chain should be encouraged to strengthen their control of their respective suppliers to enhance the dialogue in the industry.

5.2 Wool, feather, leather and other products from animals

All suppliers to companies subscribing to this policy must adhere to national and international legislation on animal welfare as well as be encouraged to adhere to the Five Freedoms defined by EU Farm Animal Welfare Council/World Organization by Animal Health (OIE). These are:

Freedom from hunger and thirst

Freedom from discomfort

Freedom from pain, injury and disease

Freedom to express normal behavior

Freedom from fear and distress

To promote these practices and enhance the traceability in the supply chains, all suppliers should also be encouraged to place the same demands on their sub-contractors and cooperate to improve the industry dialogue.

6.Business Ethics

6.1 Corruption, Extortion, Embezzlement and Bribes

ULLMAX is only prepared to do business with companies that use sound and ethical practices. Corruption, extortion, and embezzlement, in any form, are strictly prohibited and may result in immediate termination as a supplier to ULLMAX and legal action. Suppliers may not offer or accept bribes or other means of obtaining undue or improper advantage.

6.2 Conflicts of Interest

Conflict of interest between a supplier and ULLMAX must be avoided. Conflicts of interest may include outside business activities, personal financial interest, inside information, employment of, buying from, or selling to family members and close personal friends.

6.3 Data Protection

Suppliers shall follow applicable data protection laws and regulations.

6.4 Conflict Zones

Suppliers must ensure that no business that we do in any way supports war, conflict, drug trade or slave trade. This includes the use of conflict minerals.

6.5 Money Laundering, Terrorist Financing and Financial Crime

Suppliers shall take preventive actions and perform adequate due diligence(s) to avoid being part of or facilitate money laundering, terrorism financing and/or other financial crime.

6.6 Trade Sanctions and Export Control

Suppliers shall comply with applicable international sanction programs issued by the European Union and the United Nations and other applicable sanction authorities as well as other applicable export control laws.

7. Monitoring and Enforcement

7.1 The principle of trust and co-operation

ULLMAX expects all its suppliers to respect the above Code of Conduct and actively do their utmost to achieve our standards. We trust our own staff to take a high level of responsibility for their work, and we expect from our suppliers that they will do the same. We believe in co-operation, and we are willing to work with our suppliers to achieve workable solutions in each individual case.

7.2 Monitoring

All suppliers are obliged to keep ULLMAX informed about where each order is being produced. ULLMAX reserves the right to make unannounced visits to all factories producing our goods, at any time. We also reserve the right to allow an independent third party of our choice to make inspections. To ensure compliance with our Code of Conduct.

7.3 Non-compliance

Should we find that a supplier does not comply with our Code of Conduct, we will terminate our business relationship with this supplier if corrective measures are not taken within an agreed time limit.

If we find repeated violations, we will immediately terminate the co-operation with the suppliers and cancel our existing orders.

All suppliers must sign the Code of Conduct and therefore undertake to comply with the requirements.

Date

Supplier name

Name

Signature

Company stamp

