



RAW ETHICS

ABOUT G-STAR RAW

Our unrelenting passion for denim has driven us to take craftsmanship to the next level. “Hardcore Denim” is the philosophy that pushes us to invent and explore – down to the smallest detail. With this dedication to quality and progress, we represent the forefront of the denim industry, producing pioneering styles and challenging industry standards. Innovation and sustainability are at the core of our DNA. We are committed to lead by example and develop sustainable solutions for the future of fashion.

ABOUT RAW ETHICS

G-Star is shaped by its people; we all contribute to making G-Star what it is today and what it will be tomorrow. It is important that we know, share and carry out G-Star’s values. The RAW Ethics capture how our actions and decisions fit our shared values, and assure a responsible and ethical work environment for everybody at G-Star. It applies to G-Star RAW C.V. and its subsidiaries worldwide.

Because G-Star values a responsible approach in all business activities, the aim of the RAW Ethics is to give everybody at G-Star a clear framework of standards and guidelines. Common sense and commitment are the basis; simply using good judgment, acting with care and consideration, and bringing potential problems to G-Star’s attention will in most cases be sufficient to meet the RAW Ethics. We require our employees and external temporary colleagues to respect the RAW Ethics and act in the best interests of G-Star at any time.

We expect everyone to promote a culture of openness in which we all feel comfortable raising questions and concerns regarding the interpretation of the RAW Ethics. We encourage you to speak to your manager or HR in case you have a concern or to report a suspected violation of the RAW Ethics. In addition, you can raise concerns or make reports of suspected compliance violations by calling or mailing the RAW Counselor. The RAW Ethics are effective as from 1 May 2016. Over time, new policies will need to be written and old ones revised. The latest version of the RAW Ethics will always be available on RAW Connect and new employees will receive a copy of the RAW Ethics with their employment agreement. Violation of the RAW Ethics or the law will result in corrective action up to and including recovery of damages, filing of criminal charges and disciplinary action up to termination of employment (depending on the nature and severity of the violation).

In case you have any questions, suggestions or doubts about compliance with the RAW Ethics, please contact your manager or HR or for our colleagues in Europe one of our RAW Counselors.

RAW ETHICS - RAW COUNSELORS

Do you have a question about the RAW Ethics, a complaint or a suspicion of a violation of the RAW Ethics? Is it related to undesired behavior or integrity issues? Do you want to talk about it confidentially?* You can speak up and contact one of our RAW Counselors.

The G-Star RAW Counselor is your go-to person to confidentially discuss integrity violations or undesired behavior (Chapter 7 of the RAW Ethics). The RAW Counselor will listen to you and inform you about your rights and possibilities to deal with your concerns. If you are unsure on how to deal with a situation that may fall under any rule of our RAW Ethics, you can ask our RAW Counselors for advice. Whenever you have a suspicion of a violation of the RAW Ethics, you can reach out to your supervisor, to HR or to one of our RAW Counselors.



***Our RAW Counselors operate autonomously and will treat all information you provide confidentially and with care.**

In very exceptional cases, the RAW Counselor may have an obligation to disclose information you have shared with him or her:

- If there is a reasonable suspicion of a serious violation, which can lead to significant damage to the interests of our organization, if we do not have the chance to investigate and take the right means to prevent or minimize further damage, the RAW Counselor may be obligated to disclose certain information. These situations include reasonable suspicion of crimes for which our organization has a duty to report and reasonable suspicion of so called misconduct with an impact on our society, such as large scale fraud and corruption, environmental crimes, violations which put public health or safety at risk. In such a case, the RAW Counselor may need to disclose certain information about the situation or incident, but will keep the identity of the person who reported the matter to the RAW Counselor confidential.
- The RAW Counselor must disclose information if so required by a judge.
- Anyone who has knowledge of certain very serious crimes (including but not limited to rape, cross-border abduction, manslaughter and murder) is obliged under Dutch law to report these crimes to the authorities. This rule applies to everyone, also the RAW Counselor.

You can reach the Raw Counselors via e-mail or phone:

Cindy Voesenek
E-mail: speakup@g-star.com
Phone number: +31205677733

Martina Rossel
E-mail: speakup@g-star.com
Phone number: +31205677733

To assist G-Star in investigating your report, you are encouraged to communicate all of the information you feel comfortable providing.

Non-Retaliation

G-Star policy protects employees who raise concerns in good faith against retaliations

1. LAWS AND REGULATIONS

G-Star policies and all local and national laws in countries where G-Star does business apply when doing your job. Make sure you know the company policies and (local) laws that are related to your job including the RAW Ethics.

Ask yourself:

- *Is this legal?*
- *Is this compliant with G-Star's RAW Ethics?*
- *Is this the right thing to do?*
- *Am I authorized to do this?*
- *Would this decision be perceived as ethical by others?*
- *Would I want to see this reported in the media?*

If the answer is 'No,' good common sense is the best guide and you should refrain from acting. You are encouraged to talk with your manager or discuss the situation with HR or the RAW Counselor.

2. GIFTS AND ENTERTAINMENT

We do not accept or ask for presents, commissions or any kind of gratification from any person, party or firm connected to G-Star including (prospective) customers, suppliers, vendors or competitors. At any time, we want to



avoid even the appearance that business decisions are based on improper payments, favors, gifts or anything else of value.

Receiving gifts

Please keep in mind that:

- Any employee receiving any amount of money or non-cash gifts valued at € 50, - (or equivalent) or more from any third party is prohibited. This includes, for example, trips, favors, products, gift certificates, entertainment, or tickets to events.
- If someone tries to give you a gift with a value of more than €50,-, even at your private address, tell your manager or HR.
- If you have received a gift valued at € 50,- or more that cannot be returned or refunded, you should provide a written statement to HR. G-Star may decide to donate the gift to charity on behalf of G-Star.

Question: *One of my third-party advisors invited me for a conference at no cost to G-Star. Can I accept the invitation?*

Answer: *No. Accepting a free trip from an advisor is a violation of company policy. If you are interested in attending the conference speak to your manager. Most costs associated with your attendance at the conference must be paid for by your department.*

Exceptions can be made - with prior approval of your manager - if you are requested to speak about your field of expertise on behalf of G-Star at a conference. The presentation or talking notes must be supported and approved by the Corporate Communications department.

Question: *A vendor sent me a USD 75 portable hard drive as a gift. Can I keep it?*

Answer: *No. Accepting a gift at €50 (or equivalent in USD) or more from a vendor is a violation of company policy. You should return the portable hard drive or give the vendor a refund for the value. If you are unsure of the value, return it. In any event, you should advise the vendor about our policies regarding conflicts of interests.*

Question: *A customer offered tickets to a concert to a co-worker and myself, each valued at €50 (or equivalent). We plan to meet the customer's team at the event. Can we accept them?*

Answer: *Yes, generally, business-related entertainment valued at less than €50 (or equivalent) is allowed.*

Donating gifts

Please keep in mind that: Gifts or entertainment to any third party must support the legitimate business interest of G-Star and follow the following guidelines:

- they are not intended to improperly influence the decisions of the other party, or require or imply a return obligation or favor;
- they are of a value reasonable in relation of the circumstances and business customs;
- are lawful in the country in which they are given; and
- have been disclosed to your manager or HR management.
- Generally speaking, gifts or entertainment to government officials are not allowed.

Exceptions:

Chinese Communities: G-Star does not encourage the acceptance of 'Lai See,' and employees should not under any circumstance solicit for it. However, management respects and understands the Chinese tradition of giving 'Lai See'



during Chinese New Year as a friendly gesture. Therefore, only on this occasion may employees accept a cash gift in the form of 'Lai See' and only for a nominal amount valued up to HKD 100 (or equivalent).

Japanese Communities: G-Star does not encourage the acceptance of 'Ochugen' (Summer Gift) or 'Oseibo' (Year-end Gift), and employees should not under any circumstance solicit for it. However, management respects and understands the Japanese tradition of giving these gifts as a courtesy. Therefore, only on these occasions may employees accept a non-cash gift in the form of either 'Ochugen' or 'Oseibo' valued up to 7,500 yen (or equivalent).

3. BRIBES AND IMPROPER PAYMENTS

We do not promise, offer or authorize money (including kickbacks or (undisclosed) commissions), products, services or anything of value to anyone in order to influence acts or decisions of (government) officials to receive any special treatment for G-Star or for personal gain.

To comply with anti-bribery laws, no employee should ever offer, directly or indirectly, any form of gift, entertainment or anything of value to any government official or his or her representatives to: obtain or retain business, influence business decisions, or secure an unfair advantage. These prohibitions apply to our complete business operations and to anyone acting on our behalf, including agents, consultants, suppliers and contractors.

Take local laws on anti-corruption into account and use your discretion to assess whether gifts offered may be a bribe.

Ask yourself:

- *What is the intention behind the gift?*
- *What is the nature, value and timing of the gift?*
- *Is the gift given openly or secretly?*
- *Are advantages, favours or benefits expected in exchange?*

Further, please take into account that tipping standards differ across the world. Tipping is never allowed to influence any act or decision in order to receive a special treatment. The Entertainment and Credit Card guidelines as provided on the Intranet give you further guidance in this respect.

4. CONFLICTS OF INTEREST

We always keep G-Star's interests top priority when doing business and never let business decisions be influenced by personal relations. Keep in mind that:

- Doing business with parties such as relatives, friends, former colleagues, spouses or life partners can only be done after obtaining a written approval from HR.
- Pressuring others into hiring a relative or friend as employee, supplier, vendor or landlord of G-Star is not allowed.

Question: *Can I hire my friend to coordinate a photo shoot for an in-store event? Three photographers submitted bids for the job, and his is the most competitive.*

Answer: *You may hire your friend for the photo shoot as long as the decision is not in any way influenced by your relationship with him. However, you must first get written approval from HR.*

5. RELATIONSHIPS AT THE WORKPLACE

While we recognize and respect the right of employees to associate freely and to pursue personal relationships with those they encounter in the work environment, employees should use good judgment in ensuring that those



relationships do not negatively impact their job performance, the work environment and their ability to supervise others or the sharing of confidential information.

Keep in mind that:

- Any workplace conduct arising from an intimate relationship, family relationship or friendship between G-Star employees or stakeholders may be improper if the conduct creates an uncomfortable work environment for others. Favoritism, open displays of affection, and making business decisions based on emotions or friendships rather than on the best interests of G-Star are examples of inappropriate conduct.
- Employees in a reporting relationship with someone they are consensually dating, romantically involved with, living with or related to, should inform the next level of management or HR. HR will work with both individuals to try to separate their employment responsibilities from their personal relationship in order to protect the interests of both employees and others and to avoid any conflict of interest.

6. SOCIAL MEDIA AND EMAIL

Social media and online collaboration has its effect on the way we work together and communicate with customers and colleagues. What is shared online is shared with the world.

Please keep in mind that:

- As an international brand, G-Star gained a permanent place in the world of denim and a strong following worldwide. We should all be proud of this and can share it with the world. However, only share publically known information: e.g. *'Pitti Uomo was fantastic'* or *'check out: G-Star has a new Spring Summer collection'*;
- You are not allowed to disclose any confidential information of financial, commercial or legal nature about G-Star and its affiliated companies, its customers and other business relationships;
- It is not allowed to use or include the word 'G-Star' or 'G-Star RAW' in the name of your own online account.
- Only official G-Star spokespersons are allowed to talk to the press about G-Star. When you receive a press request, always forward it to the PR Department (pr@g-star.com) to prevent the risk of providing information that is incorrect, confidential, or not in line with our brand identity.
- During working hours, social media and Internet should not be excessively used for personal objectives;
- G-Star reserves the right to monitor the use of social platforms by employees and take appropriate action to protect against any misuse that might harm G-Star's reputation.

For the use of email bear in mind that:

- Emails are for business use and are G-Star property.
- Phishing emails have increased, so be suspicious of unknown links or requests sent through email or text messages. You have to verify the authenticity of requests from companies or individuals by contacting them directly.
- You have to use Share file for any personal data, proprietary or sensitive information sent via email.
- G-Star encourages email etiquette, contact your manager for more information about email etiquette.

You are not allowed to use personal and other email accounts not assigned to you by G-Star for business purposes. These personal email accounts may also not be used as a back-up or personal database of business related e-mails or other files.

RAW Connect

RAW Connect is our Internal Communication Platform. Via this internal platform, G-Star employees have different options to interact with other colleagues and to share news and updates. Please keep in mind the following rules:



- **What should I post?**
 - Questions and requests for help and replies offering assistance
 - Great ideas and constructive suggestions
 - Updates on teamwork and projects (after approval of your team members for posting the update).
 - Interesting articles about trends or factors affecting the business

- **What shouldn't I post?**
 - Inappropriate jokes or derogatory criticisms
 - Anything that violates your company usage policy
 - Anything you would not feel comfortable sharing with your manager
 - Anything related to/about your colleague(s), before asking for their approval.

7. ZERO TOLERANCE FOR DISCRIMINATION OR HARASSMENT

G-Star has zero tolerance for discrimination or harassment of any kind and/or any other offensive or disrespectful conduct, also referred to as “undesired behavior”. Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment. While the legal definition of harassment may vary by jurisdiction, we consider the following non-exhaustive list to be unacceptable behavior:

- sexual harassment
- offensive language or jokes
- racial, ethnic, gender or religious slurs
- degrading comments
- intimidating or threatening behavior
- showing hostility towards others because of individual characteristics

Employees treat others the way they would expect to be treated. G-Star will promptly and thoroughly investigate all complaints of discrimination or harassment. G-Star employees are expected to cooperate fully in any such investigation.

If you feel you have been subject to or have witnessed discrimination, harassment or retaliation in the workplace, please report this promptly to your manager or HR or discuss this confidentially with the RAW Counselor. The RAW Counselor will listen to you and provide advice on possible next steps. Neither your manager nor G-Star will take any action against you for addressing situations of discrimination or harassment or for cooperating in any such investigation.

8. HEALTHY AND SAFE ENVIRONMENT

We are committed to provide a safe, sustainable and healthy working environment. It is up to each and every one of us to contribute to this. You are expected to be responsible when it comes to paper consumption, proper sorting and disposal of waste, re-using glasses and mugs, and energy usage at our offices and stores. As part of the G-Star clean desk policy, you should leave your own work area clean and tidy at all time. Besides your own desk, you are also responsible to should leave meeting rooms and other shared spaces clean and tidy after usage.

9. ALCOHOL AND DRUGS

Please keep in mind that:

- As a G-Star employee you are not allowed to use, sell, possess, purchase or transfer (illegal) drugs on G-Stars’ premises, in company vehicles and during working hours. This also applies to selling, transferring or



distributing personal prescription drugs on work locations of G-Star, in company vehicles and during working hours.

- Alcohol consumption during working hours or on G-Star locations is prohibited. The only exception is that alcohol may be consumed by people of legal drinking age at company-sponsored activities that are approved by G-Star. If you are planning on drinking alcohol during these activities, please make appropriate travel arrangements to get home safely. As a responsible employer, G-Star may perform alcohol tests before people take part in traffic and may take discretionary measures if traveling is not safe.
- It is also not allowed to be under the influence of (illegal) drugs or alcohol during working hours, regardless of when the drugs or alcohol were consumed.

10. COMPANY PROPERTY

G-Star property (i.e. merchandise, samples, supplies and equipment) should be used only for business purposes and not for personal use. Taking or using company property of any value for personal purposes without appropriate permission from G-Star is equal to stealing.

G-Star property may never be used for illegal purposes. You are prohibited from any action that involves theft, (internal) fraud, embezzlement or misappropriation of company property.

Taking company property of any value for personal use without authorization is theft and may result in disciplinary action, up to and including termination of employment.

Examples of (internal) fraud include:

- Stealing property of G-Star, its customers, and/or colleagues;
- Secretly providing extra product discounts for its customer and/or colleagues;
- Secretly providing discounts for friends, family members and/or other acquaintances;
- Not scanning or registering products in the cash register system on the benefits of others;
- Taking property of any value for personal purposes without appropriate permission from G-Star

If you suspect that activities in a store, distribution center, office or other facility are resulting in financial losses, loss of opportunity or loss of savings to G-Star, please report this promptly to your manager or HR or discuss this confidentially with the RAW Counselor.

Question: *Is it okay to take home samples or defective merchandise?* **Answer:** *No. Taking any company property, including samples or defective merchandise for personal use is prohibited.*

11. INTELLECTUAL PROPERTY RIGHTS

As we expect others to recognize the legal rights we have concerning our brands and designs, we respect the legal rights others have concerning their brands, designs, software, articles and other legally protected materials.

You should never make unauthorized copies of material from copyrighted books, magazines, newspapers, videotapes or computer programs. While you may make a copy for your own business use, making multiple copies without permission violates copyright laws.

12. CONFIDENTIALITY

Information relating to G-Star's business or strategy that is not generally known to the public is strictly confidential. It should be used only as necessary to do your job and never for your own benefit. Confidential information should not be shared unless you are specifically authorized to do so. Disclose personal information only to authorized



persons who have a legitimate business reason to know the information and who are obligated to protect it. You are responsible for the safekeeping of any confidential information, whether verbal, written or electronic.

Examples of confidential information include:

- Personal employee information (for example personal health information, salary or performance history)
- Commercial information (for example product development details, marketing strategy and intelligence, undisclosed product information, designs or campaigns, choice of suppliers, envisaged store locations, pricing, costs, sales forecasts or other financial information and information in company databases, servers or CRM directories)
- Passwords and other login details,

You must make sure that all third parties who will receive confidential or proprietary information enter into a non-disclosure agreement with G-Star first via the Legal Department. When your employment ends, all confidential information and materials must be returned to G-Star on or before your last day of employment and may not be divulged or used afterwards.

Question: *How can I be sure that documents I throw away stay confidential?*

Answer: *When you dispose of confidential documents, use a locked disposal bin or shredder, if available. Do not use regular recycling bins for these materials. If you work in a store, dispose of confidential documents in a manner appropriate for your location. Ask your supervisor for guidance.*

13. TRADE, ANTITRUST & COMPETITION LAWS

Employees involved with importing or exporting goods among various countries must be knowledgeable about and comply with relevant legal requirements. Employees who have questions about such requirements or other international trade issues are responsible for consulting with the Legal and Corporate Affairs department to prevent committing any potentially unlawful acts.

G-Star and its employees must comply with anti-boycott-laws. Anti-boycott laws are intended to prevent G-Star from taking action in support of a boycott imposed by one country upon a country that is friendly to the Netherlands. A company could make such a request in a bid invitation, purchase contract, letter of credit or verbally. Complying with these requests is prohibited by law. If you learn of such a request, please contact the Legal and Corporate Affairs department directly.

G-Star employees are required to comply with the antitrust and competition laws of the many countries where we do business. All product development, manufacturing, sourcing and sales activities must conform to the highest ethical standards.

Antitrust or competition laws are complex and vary from country to country. In general, antitrust laws prohibit agreements (whether in writing or verbal) between competitors to fix or control prices, allocate territories or markets or limit the production and sales of products. Competition laws prohibit controlling the resale pricing of distributors, dealers and retailers, disparaging a competitor or misrepresenting our own products or offering improper conditions such as bribes or kickbacks. Failure to comply with antitrust or competition laws could lead to substantial fines for G-Star or even imprisonment of the employee involved. If you learn of such a prohibited activity, please contact Legal and Corporate Affairs immediately.

14. ANCILLARY ACTIVITIES

Employees may not work for or receive compensation for personal services from any customer, supplier, vendor, landlord or competitor of the company, or any business entity that does or seeks to do business with G-Star.



Employees must always get written approval of HR before accepting an additional job or assignment at a for-profit company.

Employees can serve as a director, trustee or officer of a non-profit organization in their individual capacity and in their own time. In case such a role is performed as a representative of G-Star, employees must always get written permission from HR.

Employees are free to participate in personal causes or political activities in their individual capacity and in their own time. These activities must never interfere with your commitment or job at G-Star.