

Code of
Ethics &
Conduct

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Foreword from the CEO



“At C&A, we want to inspire everyone every day to look, feel and do good. We believe in doing business the right way, with strong values and ethical standards.

Our values reflect the essence of C&A’s culture, steering our interactions with co-workers, customers, and other stakeholders every day.

Our Code of Ethics and Conduct, along with related policies, sets the expected standards of responsible behaviour that every C&A co-worker and leader must follow. It serves as a compass and empowers us to make fair and accountable choices, even when faced with difficult decisions.

I firmly believe in fostering clarity and a principled environment where we hold everyone to the same standards, regardless of their position in the organisation.

I expect us to prioritise good conduct and fairness in everything we do.

Take action. Do good. Leave no room for unethical or improper behaviour at our company.

Together, we will create fashion with a positive impact for generations to come.”

– Gina Boer

Our Values

Our values establish a shared understanding of what C&A stands for and believes in, shaping our mindset and actions at work.

By understanding and translating C&A values in our day-to-day practices, every one of us helps promote a positive climate of mutual understanding, collaboration and trust.

By living our company values, we create a supportive and predictable environment where all C&A co-workers feel comfortable seeking guidance, sharing ideas, and working together towards common goals.

We Care for People & Planet

We aim to create fashion with a positive impact and enable consumers to make more sustainable choices.

We Are Consumer-Obsessed

We have passion for fashion and for consumers. We are motivated to deliver the best products and shopping experience every day.

We Love Togetherness

We love to work as a team, striving towards a common goal, coming together as ONE C&A. Our different backgrounds and competences help us face challenges and find innovative solutions.

We Keep It Simple

We live and breathe simplicity. We keep our relationships with one another, consumers and external partners simple and direct. Striving for simplicity in our everyday tasks and making smart and cost-conscious choices are key.

We Are Forward Thinking & Acting

Making mistakes is part of our everyday life at work and at home. What we learn from them only makes us smarter and faster. Being an always-on learning community helps us grow our business and innovate the industry.

Purpose & Scope

The Code of Ethics and Conduct for C&A employees aims to safeguard our people, our reputation, and the long-term success of our business.

This Code of Ethics and Conduct, herein also referred to as 'The Code', governs the actions and decisions of all individuals within our organisation, without exception.

It sets expectations on various aspects of professional conduct that all of us must adhere to. It defines what is considered acceptable and unacceptable at C&A and offers practical guidance on compliance.

The Code addresses how we, as C&A co-workers, relate to each other, as well as to consumers, suppliers, business partners, public authorities and the communities in which we operate. It promotes integrity and responsible choices at all levels of our company. In short, it helps us do what is right.

All co-workers are responsible for upholding the Code. Leaders have the responsibility to make C&A co-workers aware of the Code, encourage them to speak up and lead by example in upholding the Code. Everyone is held accountable to the Code, regardless of their position or level of authority.

The provisions of the Code are subject to applicable mandatory law.

This Code is binding exclusively within the professional realm. We respect our co-workers' right to private life and do not seek to regulate personal matters. We trust that our employees always carry integrity with them.



Making the Right Decisions



Since our establishment in 1841, we have embraced a business philosophy built on principles of integrity, responsibility, trust, respect, and a passion for serving our customers. Central to this philosophy is our commitment to complying with applicable laws and doing what is right and fair without ever compromising the interests of C&A for personal gain.

We act with honesty in our interactions with consumers, co-workers, owners, business partners, suppliers, competitors, regulators, and policymakers. We communicate openly, accurately, and transparently both internally and externally while respecting confidentiality when necessary.

We are aware that our individual behaviours can influence the trust and integrity attributed to C&A. We refrain from engaging in activities that could erode stakeholder confidence in our company. We make responsible choices, mindful of the economic, social, and ecological impact of our actions. By acting in an ethical manner, we safeguard the reputation of the C&A brand. Moreover, we hold our suppliers and business partners to high standards of business ethics described in our Code of Conduct for Suppliers and Business Partners.

Each of us has a responsibility to identify ethical problems and show good judgement in everything we do for our business. Sometimes, we find ourselves in situations that are complex and not easily resolved.

When facing a tough decision or dilemma, it's important to ask ourselves:

- Is the planned action in line with this Code and C&A policies?
- Is it legal?
- Is it fair and inclusive?
- Does it benefit the company as a whole?
- Would I be comfortable if my actions were made public?
- Could I defend it to my co-workers, friends, or family?

While making the right choices can be challenging, upholding this Code and our values is of utmost priority at all times.

Responsibilities of Co-workers

C&A co-workers are required to follow the simple rules and the general principles outlined in the Code.

It is necessary for all of us to understand and follow all the policies and laws that apply to our work, even when under pressure to behave differently. This also means taking personal responsibility to uphold our values and this Code.

All co-workers should seek advice when we have questions or challenges in complying with the Code and fully cooperate in investigations of suspected violations of the Code.

All co-workers are encouraged to inform C&A promptly of any situations we think might break the Code by contacting our manager, our People & Culture Business Partner, the local Legal Counsel or the Compliance Officer.

Violations may also be reported through the C&A Fairness Channel or at: compliance@canda.com

Responsibilities of Leaders

Leaders have a unique responsibility to create a climate of trust and integrity in our teams. Team environment where compliance is the norm is an essential safeguard for our success.

The way we show our commitment to C&A values and this Code, establishes the standards that others will follow.

By implementing the following practices, we can maintain the expected standards of integrity on our teams:

- Inform our teams about the importance of the Code, showing support for our values and rules, and setting clear expectations for following them
- Lead by example in role modelling ethical behaviour at all times; never request our teams to engage in illegal activities, violate C&A policies or disregard C&A values
- Pay attention to situations where ethical problems might come up; take immediate action to address them; avoid any appearance of implicitly condoning such behaviour
- Create a safe space where our team members can share different opinions and raise concerns, even if they are hard to hear.



“Team environment where compliance is the norm is an essential safeguard for our success”

Compliance with Laws

We comply with laws, worldwide

As members of the international community and part of a global company, we comply with all laws, rules, and regulations in every country or region where we do business. This commitment is rooted in our belief that we are accountable for our own actions. Upholding these standards is not only about meeting legal requirements; it is a fundamental aspect of being an ethical company.

For each of us, this means:

- Respect and comply with the rules and regulations of each country or region where we conduct business
- Speak up when we think a decision or action runs counter to our Code or applicable laws
- If we become aware of or suspect misconduct or that a fellow co-worker or business partner has failed to comply with the law or intends to break it, we report the matter to the local Legal Counsel, the Compliance Officer or through the C&A Fairness Channel; we don't ignore it

Equity & Inclusion

We include people and perspectives

At C&A, we embrace our differences and value the diversity of thought, background, and identity. Everyone's experiences are important to us. We foster a supportive environment where every person feels valued for their unique qualities and contributions.

We do not tolerate direct or indirect discrimination based on age, disability, gender identity, sexual orientation, ethnicity, race, nationality, religion, socio-economic background, pregnancy, marital or family status, union membership or any other dimension of identity and its intersections. Our commitment to treating all people fairly and respectfully extends to all individuals within and outside C&A, including our valued customers.

Discrimination means treating people unfairly or differently based on their attributes, such as background, identity, or personal characteristics. It is about judging or treating someone negatively simply because of who they are.

Discrimination is wrong because it disregards the inherent value and worth of each individual and denies them equal opportunities and rights. Discrimination isn't just about obvious

acts of unfairness. It also includes subtle biases and systemic barriers that hold back groups of people.

We know that inequality takes different forms. Guided by our values, we strive for fairness in both our processes and results. We support affirmative action to ensure equal opportunity, considering the diverse needs of our co-workers – to enable everyone to reach their full potential at C&A.

For each of us, this means:

- Consider everyone, ensure they feel heard and appreciated
- Work to overcome personal biases towards those who are different from us
- Encourage diverse ideas, opinions and ways of thinking
- Build inclusive and diverse teams, embrace different genders, ages, abilities, ethnicities, races, sexual orientations, and economic backgrounds
- Ensure that our business practices do not disadvantage or exclude people based on their attributes
- Treat everyone fairly, provide support to those who may need support to succeed
- Respect other cultures and avoid assuming that our own culture is the norm
- Speak up and challenge behaviours around us that exclude people



Respect for Human Rights

We uphold human rights at all times

When we join C&A, we take on the responsibility to respect and promote human rights, ensuring the dignity of all individuals, both internally and in all business operations.

This means taking ownership of upholding the human rights of those impacted by our business: our co-workers, workers within our supply chain, our customers, and the communities in which we operate.

As a major player in fashion retail, C&A has the power to influence and shape industry norms and practices. By prioritising human rights, we can set an example and drive positive change on a global scale. This includes fostering safe workplaces, promoting fair labour practices, respecting freedom of association, supporting equity and inclusion, and safeguarding the rights of workers throughout our supply chains.

Our co-workers have the right to freely join or form unions or co-worker associations in accordance with international human rights standards, local labour laws, and relevant legal frameworks. We also respect the right to engage in collective bargaining.

We foster safe spaces where all co-workers feel empowered to speak up, in the spirit of open and respectful dialogue. We do not condone the incitement of hatred, violence, or the promotion of extremist ideas based on politics, religion, or other ideologies.

We acknowledge that our own purchasing practices can play a key role in enabling our suppliers and business partners to respect the human rights of workers. Therefore, we uphold our commitment to responsible purchasing practices in our business relationships and seek to continuously improve them based on feedback from our suppliers¹.

For each of us, this means:

- Identify risks and proactively take action to prevent any negative human rights impacts caused, directly or indirectly, by our decisions
- Do not hire anyone under the age of 16 in regular full-time jobs. Ensure protections for young workers under 18
- Reject all forms of exploitative labour practices

Read more about it in our *Human Rights & Equity Policy*

- Respect reasonable working hours and ensure fair wages
- Do not interfere with the freedom of others to seek assistance or join recognised unions, works councils, and employee resource groups
- Require suppliers and business partners to comply with international human rights standards²

1 As described in the C&A Purchasing Practices Policy

2 As described in the C&A Human Rights & Equity Policy, the Code of Conduct for Suppliers and Business Partners and its Supporting Guidelines



Harassment, Violence and Abuse

We do not tolerate harmful behaviours

C&A should be free from all forms of harassment, violence, and abuse.

We do not tolerate behaviours that undermine this principle, including but not limited to physical attacks, verbal harassment, sexual harassment, bullying and mobbing. These typically occur in the form of humiliation and degrading words, name-calling, yelling, swearing, intimidation and threats, gestural harassment, making someone's private life the target of rumours, intentionally spreading false information, pranks, cyberbullying, sabotage of an individual's work or their opportunity to grow, damage or theft of property, isolating or denying someone's presence, gender-based harassment, harassment targeting an individual's background or identity, financial abuse and power harassment where office hierarchy is misused, third-party harassment, where employees are targeted by consumers or business partners.

It is strictly prohibited to carry weapons, firearms, ammunition, explosives, or any incendiary devices on C&A premises or within company vehicles. Behaviours that pose a threat to individuals or property, or have the potential to escalate into violence, must be promptly reported.

For each of us, this means:

- Treat people with respect and be mindful of the impact of our words and actions on others
- Avoid behaviours that could cause physical or emotional harm or undue distress
- Avoid behaviours that could be seen as threatening, intimidating, or abusive
- Do not joke about threats or violence
- If a colleague is affected by inappropriate behaviour, listen, show empathy, offer assistance
- If we witness or experience any form of harassment, violence, or abuse, we report it immediately to our manager, the People & Culture Business Partner or through the C&A Fairness Channel

Substance Abuse

We do not allow substance abuse

C&A should be free from the illegal use, possession, sale, or distribution of alcohol or controlled substances. The use of alcohol or controlled substances that impair alertness or judgment is not conducive to a healthy and productive work environment. Every one of us should avoid using substances in a manner that interferes with our ability to perform our assigned tasks safely.

In cases of reasonable suspicion of substance abuse, alcohol and drug testing may be conducted on co-workers who perform tasks with potential health and safety risks, such as operating equipment. Such checks will be conducted where permissible and are subject to restrictions in accordance with applicable regulations.

For each of us, this means:

- Do not bring illegal drugs or substances to C&A premises
- Do not consume alcohol during working hours
- If alcohol consumption is exceptionally permitted during company events, we ensure that consumption is limited, responsible, culturally appropriate and is not imposed on anyone
- If we receive medical advice to take medication that impacts our job performance significantly or necessitates modified duties, we inform our manager; there is no need to disclose the specific medication or the medical purpose it serves
- Do not engage in safety-critical work under the influence of the mentioned substances

Environment

We take care of our planet

At C&A, we are motivated by our desire to do what is best for our planet. We believe in our collective responsibility to protect and preserve the environment.

We recognise that the Earth's resources are finite, and we have reached the limits of what our planet can sustainably provide. We take proactive steps towards a more sustainable future.

By embracing environmentally friendly practices, we can minimise our ecological footprint and contribute to a greener world. We prioritise suppliers who share our commitment to sustainability and aim to choose materials and products certified to high environmental standards by independent third parties.

We understand that as employees of a major fashion brand, we have a remarkable opportunity and also an obligation to make a substantial and positive difference on the environment through our daily work.

For each of us, this means:

- Conserve energy and water: be mindful of energy use by turning off lights and equipment when not in use; use water efficiently, reporting any leaks
- Reduce waste: minimise packaging waste and opt for reusable or recyclable materials where we can; properly sort and dispose of recyclables according to guidelines
- Promote eco friendly practices: educate and inspire customers and co-workers about sustainability; encourage responsible garment care, recycling, and conscious fashion choices



“At C&A, we are motivated by our desire to do what is best for our planet. We believe in our collective responsibility to protect and preserve the environment”

Corruption, Bribery, Money Laundering

We earn trust

Honest and unprejudiced business practices are essential at C&A. Financial misconduct, in contrast, undermines the integrity of financial systems, fair trade and objective decision-making. We strictly prohibit any illicit financial activities, including corruption, bribery, and money laundering.

By eliminating illegal activities, we support transparency and the rule of law and ensure impartial treatment for everyone involved.

It is our responsibility to identify and report any suspicious behaviour. It is important to be aware of the signs of corruption, bribery, and money laundering, minimise our risks, and raise any concerns promptly.

Corruption involves dishonest or fraudulent behaviour by individuals in positions of power, often through bribery.

Bribery is the act of offering, giving, or receiving something valuable with the intention of influencing someone's actions. It can come in different forms, such as money, gifts, favours, tickets, or promises of employment or future business.

Money laundering is the process of making illegally obtained funds appear legal by conducting transactions that hide their original source. Involvement with criminal money can severely damage reputation, have legal consequences, and even lead to the loss of operating licenses for financial services.

For each of us, this means:

- Do not take unfair advantage through manipulations, concealment, misuse of privileged information, misrepresentation of facts, or any unfair practices
- Never offer or accept bribes; take steps to prevent bribery by others acting on our behalf, for example, by conducting proper checks on third parties we work with; report any suspicions of bribery immediately
- Avoid cash transactions, except for sales transactions conducted through our Points of Sale
- Do not accept or offer anything that could create an appearance of obligation or harm our independence

- Do not engage in the facilitation payments
- Grant benefits to business partners, customers, or other third parties only in compliance with the law
- Always abide by existing rules
- Avoid actions that may violate money laundering laws
- Show zero tolerance for in-compliant behaviours from anyone representing C&A; immediately report any suspicious conduct to our line manager, to the local Legal Counsel, the Compliance Officer or through the C&A Fairness Channel

Anti-Trust & Fair Competition

We play fair

Our business success depends on the excellence of our people, services, and products. We understand that healthy competition fuels innovation, serves our customers and pushes us to constantly improve. We compete fairly and refrain from engaging in any practices that limit competition within a particular market.

Promoting open and fair competition while ensuring customers have access to a variety of products at affordable prices benefits everyone involved. Violations of competition law can have severe consequences for both the company and individuals, including negative publicity, damage to reputation, substantial fines, and even imprisonment.

For each of us, this means:

- Follow the rules of anti-trust and competition laws where applicable to your role
- Only enter into agreements that are permitted under applicable competition laws prohibiting any coordinated action between market participants to fix or artificially inflate prices, divide markets, or otherwise restrict trade
- Avoid any activities that unlawfully limit competition
- If we become aware of the questionable behaviour of a third party, be a competitor, business partner, or any other party, immediately end all interactions and promptly report our suspicions to the local Legal Counsel, the Compliance Officer or through the C&A Fairness Channel

Conflicts of Interest

We avoid conflicts of interest

Everyone at C&A should make sure that our decisions are not influenced by conflicts of interest.

A conflict of interest occurs when our personal or family interests, duties, or activities clash with the best interests of the company. This can get in the way of good business, undermine trust and damage our reputation.

Our selection of suppliers is solely based on objective and factual criteria aligned with our business requirements. In seeking partners, we identify companies and individuals who offer high-quality and competitive products and services and uphold social responsibility. Detailed supplier expectations are outlined in the Code of Conduct for Suppliers and Business Partners.

The following are common examples of activities that raise concerns about conflicts of interest:

- Knowingly owning a financial stake, directly or indirectly, in any business that is involved in C&A business or competes with C&A
- Engaging a supplier, distributor, or agent that is owned or managed by a close friend or family member
- Accepting compensation or expensive gifts from a supplier, distributor, or agent for recommending their services to C&A
- Taking advantage of business opportunities that should rightfully be pursued by C&A, such as using client relationships for personal gain
- Holding a second job that interferes with our C&A responsibilities or violates any agreements signed with C&A
- Being employed, consulting, or serving on the board of directors for a competitor, supplier, or service provider
- When a manager or an individual in a position of power initiates or maintains a close relationship with a subordinate co-worker under their direct influence or authority.

For each of us, this means:

- Avoid any actions or decisions that give rise to potential conflicts of interest
- Adhere strictly to C&A procurement standards and procedures
- Avoid any form of preferential treatment throughout the entire supplier relationship
- Disclose conflicts of interest proactively and in a transparent way to our line manager

- Disclose conflicts of interest by filling out a Conflict-of-Interest Disclosure Form and emailing it to People & Culture and the local Legal Counsel or the Compliance Officer
- When in doubt, we ask our manager for advice first
- If a line manager or a person in a position of authority initiates or maintains a close relationship with a subordinate employee under their direct influence or authority, the manager should immediately notify the People & Culture department; this is crucial to address the potential challenges arising from the power imbalance and conflicts of interest



Gifts & Entertainment

We do not allow gifts to influence our judgement

We highly value the relationships we establish with our customers and suppliers, as they are built on openness and integrity. Our business decisions will never be affected by favours or presents, nor will we ourselves try to influence others through such means.

To maintain this integrity, it is strictly prohibited for our co-workers to accept, solicit, or offer valuable gifts or entertainment from individuals or organisations seeking or having a relationship with C&A.

However, in certain cases, the occasional acceptance or offer of token gifts or modest hospitality can express goodwill in our partnerships. This should be done in a transparent manner, ensuring that there is no suspicion of impropriety. It is crucial that these gestures never influence our judgement or be used as a means to influence others.

When engaging with civil servants or politicians, it is essential to exercise caution. Even seemingly small acts, such as buying a meal, can be inappropriate or even unlawful. It is advised to avoid such situations altogether.

For each of us, this means:

- Politely but firmly deny or send back any valuable gifts, lavish hospitality or inappropriate entertainment that may jeopardise our reputation
- Make sure that the food and drinks are separately paid for by each party during business lunches or dinners
- Infrequently, we may accept or give token gifts or modest entertainment of nominal value
- Report any gifts that exceed € 60 by filling in a Gift Declaration Form and emailing it to our manager and local Legal Counsel or the Compliance Officer¹
- Ensure that our business decisions and relationships are not influenced or perceived to be influenced by exchanges of gestures

Depending on the local context demands, C&A may choose to establish more stringent local Gift & Entertainment guidelines that address risks or concerns in a particular location.

- Know our business partner's gift and entertainment policy before offering token gifts or modest entertainment
- Refrain from entertainment or gifts to civil servants and politicians; when in doubt, consult our External Affairs Lead and the local Legal Counsel

1 Training and seminar sessions that are moderately priced, provided to enhance or maintain co-workers' professional knowledge in the current role they are in, are exempt from the gift threshold declaration duty.

Data Privacy

We safeguard personal data

In our day-to-day operations, we handle a variety of personal information and data that belongs to our customers, business partners, and colleagues. To keep this information confidential, we follow strict standards. We also understand that collecting, storing, processing, and using personal data requires consent, contracts, or legal bases.

Personal data is any information that relates to an identified or identifiable living individual. It goes beyond images and addresses.

Privacy is the right of individuals to know and have control over how their personal data is collected and handled.

Laws regulate personal data protection. We continuously review our practices to prioritise data protection. Breaches not only damage trust and reputation but can also lead to penalties, fines, lawsuits, or other sanctions against C&A and individuals.

For each of us, this means:

- Only process personal data for specific purposes and within regulations
- Keep data only as long as needed for the intended purpose for which it was collected
- Ensure that only people with the right of access can read, copy or edit the information; grant access to data only on a need-to-know basis
- Follow privacy rules when sharing personal data with third parties
- Contact our manager or competent data protection officer in case of any doubts

Read more about it in our [*Policy for Protection of Personal Data*](#)



Protection of Privileged & Confidential Information

We protect sensitive information

At C&A, we handle confidential information, including trade secrets, new product details, financial projections, and customer data, with the utmost caution and always seek to protect it from unauthorised disclosure. This responsibility extends to the confidential information of our colleagues, as well as that of our customers and business partners.

We acknowledge that any information, knowledge, or data we acquire or process as part of our role belongs to C&A and should not be used, disclosed, or shared without explicit authorisation from a line manager.

The unauthorised use or distribution of this information may be unlawful and can result in legal penalties, both civil and criminal. It may also subject individuals involved to disciplinary action, including termination of employment.

For each of us, this means:

- Treat confidential information with extreme care and never disclose it to unauthorised persons
- Protect confidential information by using company-approved devices, software, and creating strong passwords, according to our password standards
- Never create, access, or use confidential information in environments where it may be visible or audible to third parties

Intellectual Property

We defend our intellectual property

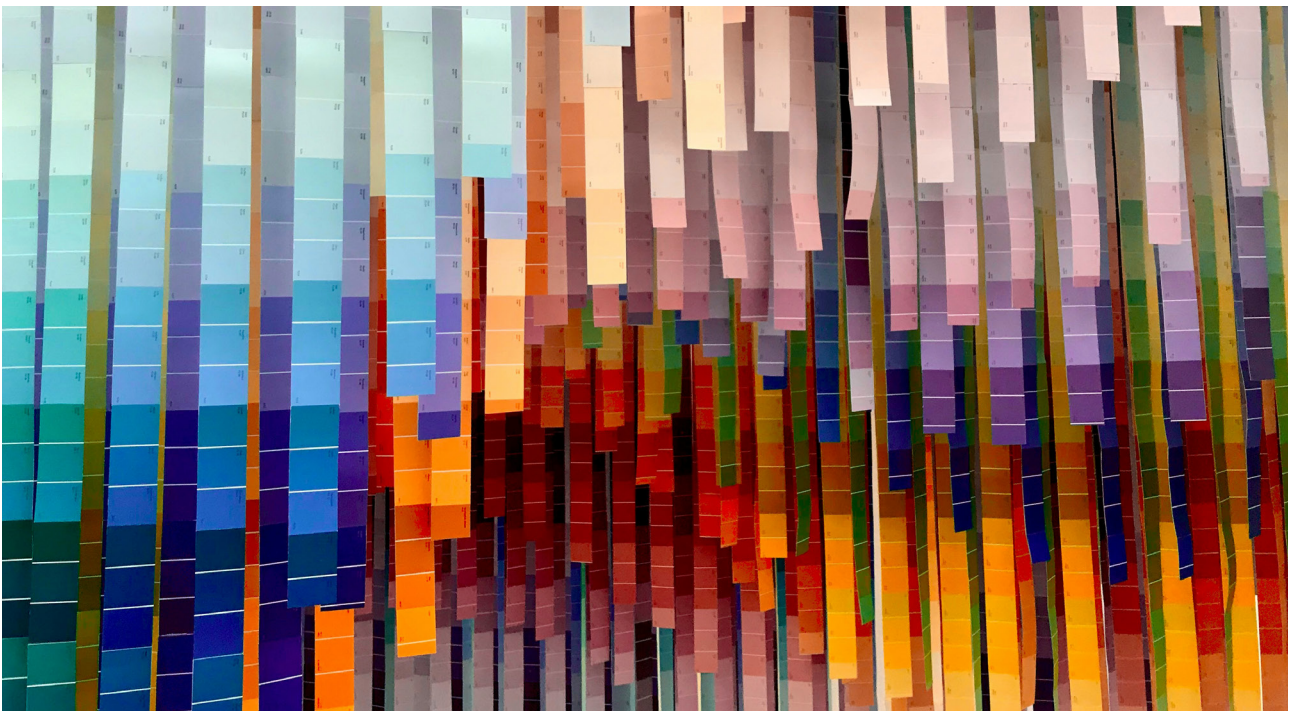
Our intellectual property (IP), especially our C&A brand, is one of our most valuable assets. IP rights can take many forms, including trademarks, designs, patents, logos, symbols, names, images or copyrights. These IP rights are valuable because they differentiate us from competitors. This is why we need to work together to protect them.

We are also committed to respecting the IP rights of third parties. We expect that all our employees take the IP rights of third parties into due consideration in their daily work.

We defend our IP rights whenever we discover an infringement. We also recognise, that infringement of IP rights can harm not only company assets but also our reputation and the trust that our customers, competitors and business partners place in us. Infringements may also lead to high financial losses for C&A and consequences under civil, criminal and labour laws.

For each of us, this means:

- Safeguard C&A's IP from unauthorised disclosure and misuse
- Promptly notify the local Legal Counsel if we suspect any breach or unauthorised use or access to our IP rights
- Respect the IP rights of others



Protection of Company Assets & Resources

We use C&A resources wisely

We strive for responsible and efficient use of company assets and resources.

C&A assets include categories such as physical assets (e.g., office furniture, equipment, and supplies), technology assets (e.g., computer hardware, software, and information systems), financial assets (e.g., cash, securities, and credit cards), as well as information assets (e.g., intellectual property, product/service information, and data).

Our co-workers recognise and respect that company assets and resources are owned by C&A and that everyone has the responsibility to preserve and protect them from theft, cyberattacks, loss, waste and misuse. Irrespective of whether we use physical or technology assets provided by C&A within or outside the workplace, they must be used solely for business purposes unless otherwise authorised.

Selling, lending, or giving away these assets, regardless of their condition or value, is strictly prohibited unless authorised.

We extend the same level of care to assets entrusted to us by others.

For each of us, this means:

- Use C&A assets and resources responsibly for legitimate business purposes
- Do not use C&A assets for personal gain or unrelated purposes without authorisation
- Refrain from using company credit cards for non-business-related expenses, such as personal subscriptions and purchases
- Avoid using company phones for excessive personal calls, messaging or data consumption
- Report any suspected misuse, loss, or damage of C&A assets
- Follow maintenance procedures to ensure the proper care of C&A assets
- Comply with procedures regarding the protection of C&A assets and resources

Social Media

We use social media responsibly

In today's interconnected world, social media has become an integral part of our lives, both personally and professionally. These platforms offer opportunities to share our thoughts, experiences, and visual content with others.

At C&A, we use social media in our marketing and corporate communications to reach consumers and stakeholders. Our co-workers play an important role as our most valuable brand ambassadors.

Every one of us can help C&A strengthen its reputation, build stakeholder recognition, and improve our digital leadership. By sharing our genuine positive experiences and our values, we can amplify our employer brand and showcase our dedication to quality, affordability, sustainability, and inclusion.

At the same time, we are also aware of the challenges and risks associated with social media platforms. Actions taken by any one of us on the internet, particularly on social media, can have far-reaching consequences. We understand the potential real-life impact on everyone involved.

Therefore, we employ great care to ensure that our words and actions online do not cause harm to our relationships or damage the reputation of C&A.

We strongly advise against engaging in any form of hate speech, promoting intolerance, cyberbullying, or inciting violence on social media.

By using social media with care and professionalism, we can leverage its potential and maintain trust within our community.



For each of us, this means:

- Consider sharing our authentic experiences at C&A and our appreciation of C&A garments
- When there is room for doubt, if expressing our views online, clarify that we are sharing our personal opinions and not representing the views of C&A
- Always seek permission from our colleagues before posting any images of them online
- Keep in mind that content shared on social media is often permanent

Contacts with Governments

We engage governments transparently

We believe in conducting our interactions with government entities, public authorities and their officials in a manner consistent with our dedication to integrity and compliance. We engage with governments in a way that upholds the spirit of the rule of law and aligns with our commitment to being a responsible corporate citizen.

We provide accurate and timely information to government entities and public authorities, ensuring transparency in our dealings. Our commitment to this principle is contingent upon requests being lawful and aligned with our organisational objectives, maintaining a balance between our rights and responsibilities.

We disclose all instances of influencing public policy and distance ourselves from any interest and political groups. We do not influence policymaking in a way that reduces obligations to respect internationally recognised human rights.

For each of us, this means:

- Know the laws and regulations governing interactions with officials relevant to our work
- Maintain open communication and provide accurate information as required by officials; assess every request in consultation with the local Legal Counsel, considering C&A's best interests
- Do not provide information to officials that might result in risks to fundamental human rights
- Keep records of all interactions with officials, including meetings, correspondence, and any relevant documents, ensuring their accuracy and completeness
- Do not offer or accept any form of improper incentives to

- government entities or officials; avoid activities that may compromise the integrity of our interactions with officials
- Do not engage in any form of unauthorised policy influencing on behalf of C&A
- Report any concerns or potential violations related to contacts with government entities or officials to the local Legal Counsel and External Affairs Lead

Grievances and Whistleblowing

We speak up
and listen up

C&A promotes open and honest communication, trust, fairness and accountability. This commitment extends to the way we handle complaints.

Whenever possible, we encourage every coworker to feel empowered to share their concerns directly with the person(s) involved, knowing that their concerns will be given due consideration. In the same way, we assume good intentions and actively listen to understand when someone flags a problem with our actions. The next step is to discuss the matter either with our manager or their manager.

Every manager should create an environment of openness and trust, making sure employees feel comfortable reporting their concerns. Managers should never ignore or dismiss the concerns raised by co-workers. Instead, they should respond promptly and appropriately by addressing the reported concerns or explaining why corrective action is not justified based on this Code.

Managers should seek the employee's permission and promptly share major complaints with the local Legal Counsel or People & Culture Business Partner. This ensures C&A can take appropriate measures at the corporate level, addressing the reported concerns effectively and preventing their reoccurrence.

We recognise that there are situations where it may not be possible or appropriate to address concerns directly, including with our (senior) manager. In such cases, raising grievances and reporting whistleblowing concerns is essential to ensure this Code is respected.

Specifically, whistleblowing is vital for maintaining corporate integrity and promoting ethical behaviour. We strongly believe that



You can access the Fairness Channel via c-a.com/fairness-channel or by scanning the QR code

whistle blowers play an important part in uncovering misconduct and ensuring compliance. C&A strictly forbids any form of retaliation towards individuals who raise concerns in good faith.

Every co-worker has the right to submit formal complaints to C&A, including on suspected non-compliance with this Code, without fearing reprisal. We protect the privacy of those who report concerns anonymously or confidentially and take measures to protect them from retaliation.

For each of us, this means:

- If we are concerned by inappropriate behaviour, we raise the matter with the person involved
- If we don't feel comfortable doing this or find it ineffective, we talk to our (senior) manager or to our People & Culture Business Partner
- If we don't feel comfortable doing this or find it ineffective, we contact the C&A Fairness Channel
- Don't hesitate to report concerns due to fear of retaliation
- Strive to provide accurate and specific information about our concern
- Don't make false or malicious allegations; report concerns honestly
- Cooperate fully with any investigations conducted by C&A-appointed case handlers
- Seek clarifications from People & Culture or the local Legal Counsel
- Don't discuss ongoing investigations or confidential information related to reported concerns with unauthorised persons
- Don't engage in any form of retaliation against co-workers who report concerns



Misconduct and Non-Compliance

We take violations seriously

The impact of one person's misconduct can cast a shadow over the efforts of many. Co-workers who break the Code put themselves, their co-workers and C&A at risk. It is, therefore, essential for all co-workers to be aware of their responsibilities and obligations outlined in the Code. Everyone employed by C&A is expected to comply with the provisions of the Code.

We take any violations of the Code very seriously and will impose disciplinary measures when necessary. Appropriate disciplinary actions will be determined based on several factors, including the nature and severity of the violation, its consequences, the level of cooperation with the investigation, previous instances of similar violations and self-disclosure of the violation, to the extent permitted by applicable law.

In cases of severe non-compliance, dismissal from employment may be carried out as provided by applicable law. C&A may also report the misconduct to the police or other authorities, where necessary.

It's the *C&A Way*.
One Code, One Team

Join us in upholding
the Code of Ethics
& Conduct

C&A