



CODE OF CONDUCT

NA-KD

CEO INTRODUCTION



NA-KD is an agile, fast-moving, disruptive brand that puts our customers and employees as our number one priority. At NA-KD, we encourage and empower our staff to take initiatives, make decisions and drive our business forward. How we act as individuals, representing the NA-KD brand, is paramount. We talk the talk, then we walk the talk. Vision is important, but execution is even more important.

The Code of Conduct is a document for anyone working for, or on the behalf of, NA-KD. It outlines what is expected and acceptable behavior, and what is not. It is a tool to help you navigate what is right in a particular situation and act in a way that manages legal and ethical risks. We want you to be human and we understand that humans make mistakes. But we do expect you to reflect, learn, educate and develop yourself in communication and leadership.

Go through and discuss the Code of Conduct, how it applies to your specific circumstances and area of work with your manager and your colleagues. Don't be afraid to ask for support from our relevant experts, including HR, legal or CSR, if there is something you do not understand or need help clarifying. And speak up if you notice behaviour that does not seem right to you.

It is what each one of us does that defines who we are as a company and how the world sees us. Please make sure you treat your colleagues and business partners as you would like to be treated yourself. Remember that nobody makes it until we all make it – and the bigger we grow the more good we need to do for the earth and our community.

Jarno Vanhatapio

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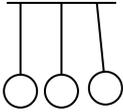
OUR VALUES

CURIOSITY



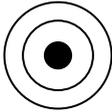
We see no limits

MOMENTUM



We get good stuff done, fast

INTEGRITY



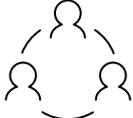
We live by our values

INCLUSION



We give everyone an opportunity to succeed

COLLABORATION



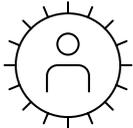
We win together

CUSTOMER OBSESSION

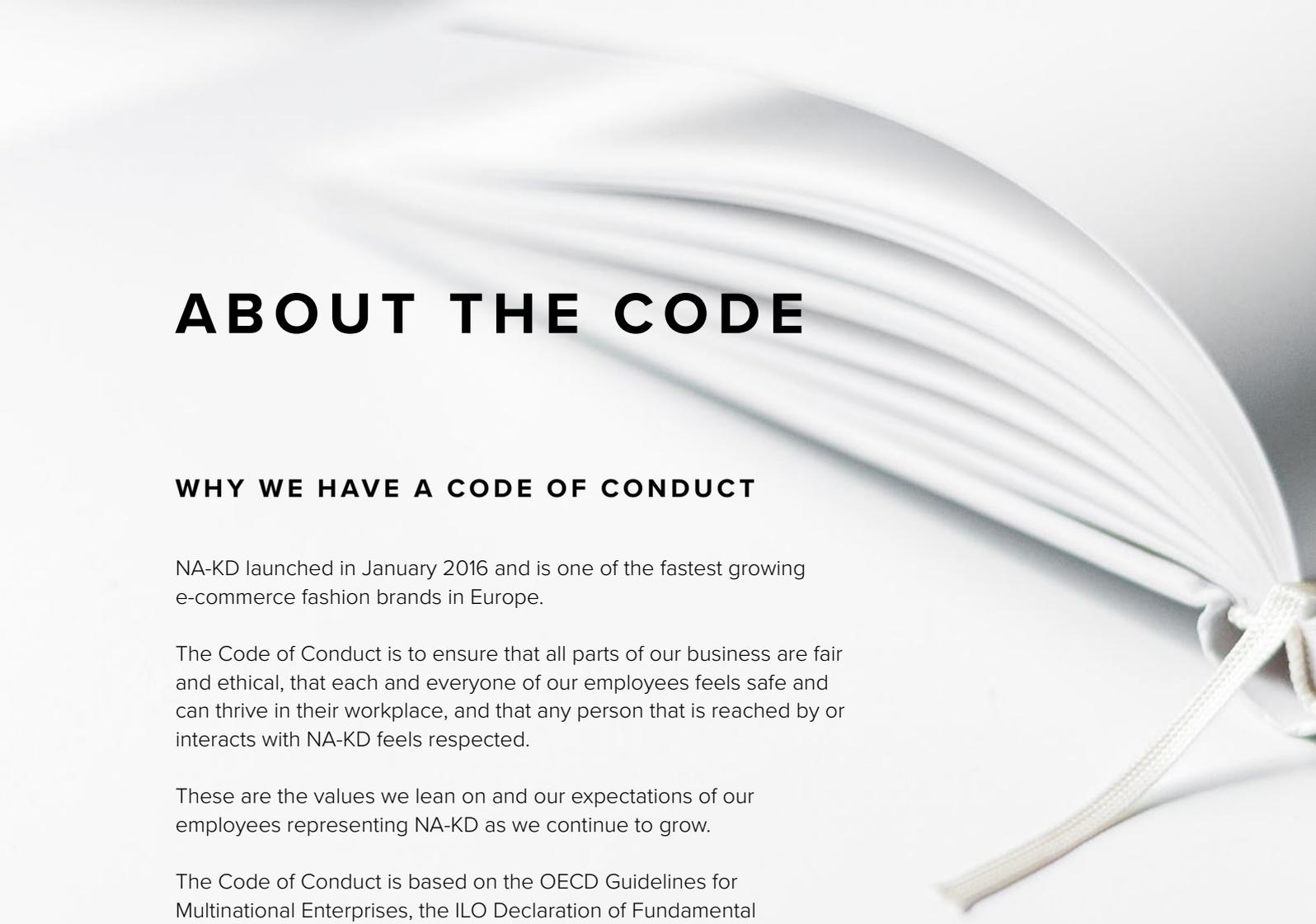


We are customer obsessed

ACCOUNTABILITY



We own our actions and excel



ABOUT THE CODE

WHY WE HAVE A CODE OF CONDUCT

NA-KD launched in January 2016 and is one of the fastest growing e-commerce fashion brands in Europe.

The Code of Conduct is to ensure that all parts of our business are fair and ethical, that each and everyone of our employees feels safe and can thrive in their workplace, and that any person that is reached by or interacts with NA-KD feels respected.

These are the values we lean on and our expectations of our employees representing NA-KD as we continue to grow.

The Code of Conduct is based on the OECD Guidelines for Multinational Enterprises, the ILO Declaration of Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. The Code is approved at highest governance level by the Board of Directors.

A NA-KD:IAN'S RESPONSIBILITY

The Code of Conduct is applicable for every representative of NA-KD. The Code should guide the business conduct of all NA-KD staff, working in any of our offices, warehouses, remotely, contract workers and interns, or anyone else representing NA-KD. We place certain responsibility on leaders in all parts of the organisation to inform and guide employees in ethical business conduct, to respond to any non-compliances that come to their attention, and to lead by example.

HOW TO USE THE CODE

You are expected to read and understand the Code of Conduct, and you will be asked to sign that you have done so as part of your employment contract with NA-KD. The Code is meant to be used as guidance, should you ever be unsure of how to behave in the workplace or in any instance where you are acting on behalf of the company. The Code of Conduct should be reviewed, respected and followed, together with all relevant local laws, and **other NA-KD policies**. Not following the Code could severely damage the company, while also leading to certain actions for the individual, e.g. termination of employment/ assignment or even criminal charges, depending on the severity of the violations.

What If I Don't Find an Answer in the Code?

If you find yourself in a situation where you feel uncertain of how to act or behave (and where the Code cannot provide you with an answer), consult your immediate manager for guidance. If your manager cannot guide you, You can always contact HR at hr@na-kd.com.

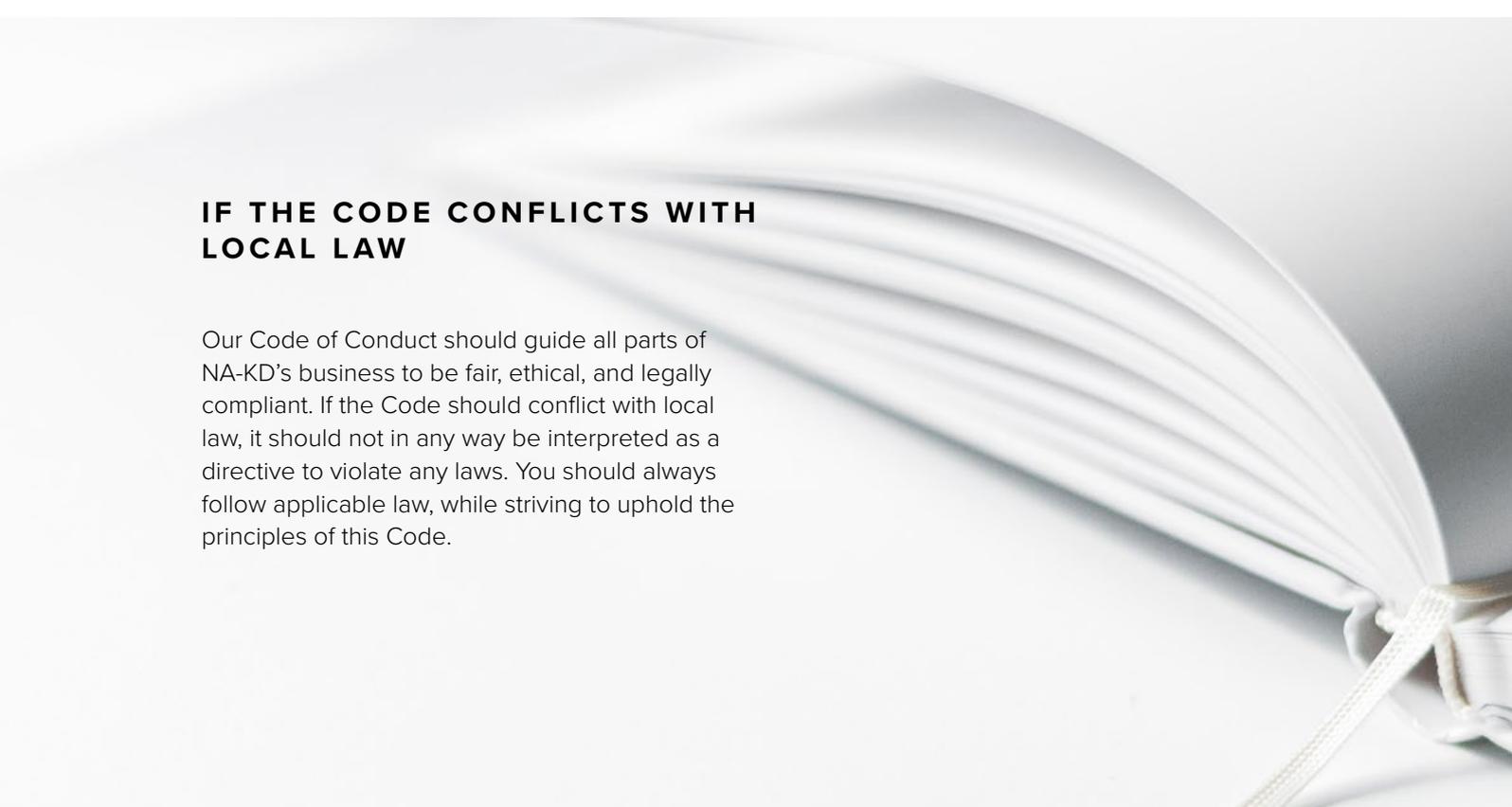
If you're ever uncertain about how to act or behave in a situation, ask yourself:

- Is it illegal?
- Is it unethical?
- Could it damage NA-KD's reputation?
- Would I be embarrassed to tell my friends and family about it?
- Would I be embarrassed to read about it in the media?

If your answer is Yes to any of the above, it is likely that the act or behaviour is inappropriate and not in line with this Code of Conduct. Please consult your manager.

IF THE CODE CONFLICTS WITH LOCAL LAW

Our Code of Conduct should guide all parts of NA-KD's business to be fair, ethical, and legally compliant. If the Code should conflict with local law, it should not in any way be interpreted as a directive to violate any laws. You should always follow applicable law, while striving to uphold the principles of this Code.



OUR PRINCIPLES

AN INCLUSIVE WORKPLACE

An inclusive workplace means that people with all kinds of differences feel welcome and valued for their contributions. From our warehouses and factories, to our offices and studios, we respect human rights for anyone touched by our business. It is NA-KD:ians' responsibility to continually work hard to allow all people to be treated with respect and dignity. We expect equality to be demonstrated in everything we do.

OUR RELATED POLICIES

- Human Rights Policy
- Work Environment Policy
- Equal Treatment Policy
- Alcohol and Drug Policy
- Rehabilitation Policy

DIVERSITY, INCLUSION AND NON-DISCRIMINATION

For us, it is a given that we are all entitled to equal rights: whoever you are, wherever you're from and whatever you believe in. NA-KD takes a strong stance against all forms of discrimination in all parts of our business. We do not accept discrimination in any form and are guided by the principle of equality of opportunity and treatment.

What does this mean for you?

- Practice non-discrimination in your work
- Use inclusive language (e.g. gender neutral, age-appropriate, non-sexist, non-racist and non-body shaming)
- Strive for equal representation in everything we do, for example marketing campaigns and collaborations
- Always greet each other in the office
- Be open to invite everyone for lunch /coffee break
- If you're a manager, strive for equal representation through recruitment given same qualifications are present

WHAT IS DISCRIMINATION?

Discrimination is when someone is disadvantaged or someone's rights are violated on the basis of seven defined grounds:

- Gender
- Transgender identity or expression
- Ethnicity
- Religion or other belief
- Disability
- Sexual orientation
- Age

HARASSMENT, VICTIMISATION & BULLYING

We do not accept harassment, victimisation or bullying in any form and we have a responsibility to ensure that our business is a place for inclusion and mutual respect. Our work environment should be positive, supportive and welcoming, and all our employees and business partners should feel safe and respected. Harassment of any kind and racism are red line firing offences no matter how senior or talented you are.

WHAT IS THE DEFINITION OF HARASSMENT?

Harassment is behavior that ridicules or disparages a person and is linked to the seven grounds for discrimination. It can take various forms, such as unwelcome physical, verbal or non-verbal conduct. Harassment can also be of a sexual nature. In addition to comments and words, there may be touching or suggestive looks. Harassment can also involve unwelcome compliments, invitations and suggestive remarks.

WHAT IS THE DEFINITION OF VICTIMISATION?

Victimisation involves actions directed against one or more employees in an abusive manner, which could lead to ill health or their being placed outside the workplace community. It concerns phenomena that are commonly referred to as bullying, psychological abuse and social exclusion. Some examples of victimisation are:

- ▶ Withholding information
- ▶ A negative greeting or not greeting someone
- ▶ Slander and gossip
- ▶ Exclusion
- ▶ Use of master suppression techniques

What does this mean for you?

- ▶ Read, understand and follow the **NA-KD Equal Treatment Policy**
- ▶ Always contribute to a positive work environment, where we include one another in our community and show respect for one another, e.g. in the workplace, in a work training session, work related social situation outside the actual workplace, and in connection with work applications
- ▶ Practice open and inclusive communication, treat others with respect and common decency
- ▶ You have a responsibility to act and address bullying, harassment and victimisation if you see indications of such. Have the courage to speak up against discriminatory behaviours, bullying and harassment when others cannot
- ▶ Managers have additional responsibility for ensuring that their teams are free from bullying, harassment and victimisation, by working proactively against such behaviours and to investigate and take action if conflicts arise



WORKING HOURS & COMPENSATION

NA-KD complies with applicable laws and agreements on working, resting hours, compensation and benefits, including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations.

What does this mean for you?

- Your working time should not exceed on average 40 hours per week. If your work requires more, or there are occasional circumstances that require overtime work, talk to your manager and prioritise together, both your tasks and when the extra hours can be taken as leave
- You should receive time off for proper rest and paid holidays or vacations
- The terms and conditions of your employment, including your rights and your obligations, should be made clear to you
- Your terms of employment and compensation should meet applicable minimum wages and other legal requirements

SAFE AND HEALTHY WORK ENVIRONMENT

NA-KD should be a safe and healthy work environment, no matter where in the company you work. This includes all people working for our business partners and contributing to our business. We need to ensure that our workplace follows all relevant laws and requirements related to health and safety. All NA-KD:ians have a responsibility to work proactively for the safety, health and wellbeing for all employees. We strive to focus in particular on mental health and psychosocial wellbeing.

What does this mean for you?

- Care for your own safety and look out for others around you
- Read and follow NA-KD's health and safety requirements and practices outlined in our **Work Environment Policy**
- Report, address or correct any health and safety hazards that you come across
- Managers have additional responsibility for ensuring that their employees have a safe work environment

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

NA-KD respects the right to freedom of association and the right to collective bargaining for all our employees. Including their rights to join or form worker's associations, and their right to choose not to do so. We see freedom of association and the right to collective bargaining as an important means of driving improved working conditions and wage levels, and expect all our supply chain partners and other business partners to respect this principle.

What does this mean for you?

- ▶ You have the right to engage in and seek employment related support and guidance from recognised unions and other employee representative associations
- ▶ Managers have special responsibility not to interfere with their employees' engagement in such workers unions or employee representative associations
- ▶ Do not discriminate in any way towards anyone because of their views on trade unions or for their trade union activities
- ▶ Do not interfere with the activities of workers' representatives while they carry out their functions in ways that are not disruptive to regular company operations

WHAT IS FREEDOM OF ASSOCIATION?

Freedom of association is the right of workers and employers to form and join organisations of their own choosing. Independent employers' and workers' organisations provide partners for collective bargaining and social dialogue.



CHILD LABOUR

Child labour is any work that deprives children of their childhood and schooling, their potential and their dignity, which is harmful to physical and mental development. NA-KD has zero tolerance towards any such forms of child labour within our own operations.

Further, our Supplier Code of Conduct, which is signed by our suppliers as part of our Purchase Agreement, clearly states that suppliers shall not engage in any form of child labour. The same zero tolerance applies for all our business partners.

What does this mean for you?

- ▶ Ensure zero tolerance of child labour, including by suppliers or other business partners
- ▶ Look out for signs of child labour, in particular when visiting suppliers and business partners, and escalate the matter if you have the slightest suspicion
- ▶ Make sure to never hire children under 15 years of age, even if it is permitted by local law
- ▶ On the occasion that children are used for photo sessions, always secure the best interest of the child, that it does not interfere with school, that the environment is safe and healthy for children, that parents/guardians approve and attend, and that the children are treated with respect
- ▶ For all photos and marketing including children, take care not to reinforce negative stereotypes of children or groups of children or to project unrealistic or inappropriate images
- ▶ If you hire young workers or interns between the ages of 15-18, make sure that they have appropriate contracts, where their rights and responsibilities are clearly defined and communicated, that they receive sufficient training, and that their work does not interfere with their schooling or pose a threat to their health, safety, or personal development

WHAT IS CHILD LABOUR?

Child labour is any work that deprives children of their childhood and schooling, their potential and their dignity, and that is harmful to physical and mental development.

A child is any person below the age of 18 years, according to the United Nations.

Not all work done by people under the age of 18 should be classified as child labour – some work participation of children or adolescents can be positive, as long as it does not interfere with their schooling or affect their health, safety, or personal development negatively.

What are examples of signs to look out for?

- ▶ Young workers (15-18 years of age) performing hazardous tasks, having responsibilities too heavy for their age or mental/physical development, working excessively long hours, lacking sufficient resting periods, or working night shifts
- ▶ Young workers employed without the consent from their parents or legal guardian
- ▶ Young workers that have not completed compulsory or basic schooling, or where their schooling/education is negatively affected by their working situation
- ▶ Young workers showing signs of deprivation (not enough sleep, food, clothing), or signs of intimidation or fear
- ▶ Suspicions of a possible situation of sexual exploitation of young workers



MODERN SLAVERY AND FORCED LABOUR

NA-KD has a zero tolerance towards any forms of modern slavery, trafficking and forced labour. Our Supplier Code of Conduct, which is signed by our suppliers as part of our Purchase Agreement, clearly states that suppliers shall not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour and that no precarious employment is allowed. The same zero tolerance applies for all parts of our business, including all our business partners.

What does this mean for you?

- ▶ Ensure the zero tolerance for modern slavery, human trafficking and forced labour, including by suppliers or other business partners
- ▶ Look out for signs of modern slavery, human trafficking and forced labour, in particular when visiting suppliers and business partners, and escalate if you suspect any of the above
- ▶ If you are a manager, ensure that your employees have freely chosen their jobs and are free to leave under their terms of employment and law

WHAT IS FORCED LABOUR, MODERN SLAVERY AND HUMAN TRAFFICKING?

Forced labor is any work or service that people are forced to do against their will, under threat of punishment and for which the person did not volunteer.

Human trafficking involves recruiting, harboring or transporting people into a situation of exploitation through the use of violence, deception or coercion and forcing them to work against their will.

What are examples of signs to look out for?

- ▶ Confiscation of identity papers, passports, or education certificates
- ▶ Withholding wages
- ▶ Lack of official employment status
- ▶ Abusive working conditions
- ▶ Physical and sexual violence
- ▶ Debt bondage, i.e. loans that have to be repaid before the employee can end his/her contract
- ▶ Recruitment fees, i.e. a person has paid a recruitment firm to get the job and must work until the debt is repaid
- ▶ Restrictions of movement, e.g. employees not allowed to leave company premises

PROTECTING THE PLANET FOR FUTURE GENERATIONS

Climate action is of outmost importance and urgency to us all and our customers demand a more sustainable approach. We will partner with them, our suppliers and our industry peers, to create a more environmentally sustainable fashion industry together. Reducing our climate footprint across the value chain and shifting towards circularity are two key aspects of this. Ensuring that our products are safe and overall working to reduce our environmental footprint in everything we do is equally important.

OUR RELATED POLICIES

- Environmental Policy
- Restricted Substances List
- Material Ethics and Animal Welfare Policy

CLIMATE AND ENVIRONMENT

At NA-KD, we strive to prevent or minimise the negative environmental impact of our own operations and take a precautionary approach to environmental challenges. Our aim is to continually reduce our product's life-cycle environmental impacts such as: resource use, emissions, negative water impacts, and waste, and use our creativity to create change towards a circular economy. We are determined to be part of the solution in creating a more sustainable and circular fashion industry.

What does this mean for you?

- Strive to reduce, reuse, repair, repurpose and finally recycle all types of materials that we use at NA-KD. From our products and packaging materials, to our pens, papers, and coffee mugs
- Choose train over airplane when possible
- Work to increase our share of more organic and recycled materials in our products, and explore new innovative, more sustainable materials and production techniques together with our supply chain partners
- For things that we need to buy, always choose the recycled or reused alternative if that is fulfilling the purpose of the purchase in a similar way as a new item would
- Manage and dispose of hazardous and non-hazardous waste generated from operations as required by applicable laws and regulations and aim to recycle everything possible



PRODUCT COMPLIANCE

The products we source from our suppliers will in most cases become NA-KD branded products. We as a company need in our turn to show that our products fulfill the requirements of our customers and legislation, as well as to fulfill our ambitions within environmental sustainability. Important topics include what substances are included in the products we source, ensuring we adhere to (and exceed) chemical legislations for all our products. We pay special attention to the products that are developed for children.

What does this mean for you?

- ▶ Don't take shortcuts or make decisions that compromise product safety or compliance
- ▶ If products contain potential conflict minerals (such as gold, tin, tantalum, tungsten and cobalt), due diligence and compliance with any applicable laws and regulation on the source of minerals contained in the products should be executed to secure its origin
- ▶ Stay updated on the REACH legislation and on the [ECHA Candidate list](#). Take actions to remove any toxic substance on the ECHA Candidate list from the production
- ▶ Stay updated and comply with the [NA-KD Restricted Substance List](#)
- ▶ Stay updated and comply with the [NA-KD Material Ethics and Animal Welfare Policy](#)

CONDUCTING BUSINESS ETHICALLY

At NA-KD, we take pride in conducting our business ethically and in compliance with applicable laws. We trust that our products and services will succeed in a competitive market place and we comply with rules and regulations, and also cross-borders.

OUR RELATED POLICIES

- Anti-bribery Policy
- Anti-money Laundering and Counter Terrorism Policy
- Conflict of Interest Policy
- Tax and Fraud Policy
- Data Protection Policy
- Trade Sanctions Policy
- Whistleblower Policy

ANTI-CORRUPTION AND BRIBERY

Corruption undermines legitimate business activities, distorts the market and exposes companies and individuals to risks. At NA-KD, we believe in conducting business ethically and do not tolerate any form of bribery or corruption.

Corruption can take different forms but can be simply defined as receiving, demanding or accepting, for oneself or for others, directly or indirectly, kickbacks, bribes, excessive gifts or hospitality or facilitation payments. We will not accept suppliers, vendors or partners that offer bribes and we will take necessary action if such actions are uncovered.

What does this mean for you?

- As a general rule, you should not accept gifts that look like and/or feel like a bribe or an attempt to influence a business decision
- Never accept anything from a supplier, business partner, or anyone else if it might affect or appear to affect your ability to be objective in your business decisions
- If a supplier or business partner offers you inappropriate gifts and entertainment, please raise the issue with your manager
- In the same manner, you should never offer to anyone else gifts that look like and/or feel like a bribe or an attempt to influence in our favor a business decision

LEARN TO SPOT A BRIBE

Bribes come in many forms, but can include cash, gift cards, the promise of a job, favours, the offer of a trip, a charitable contribution, promise to pay a debt – all offered in exchange for a favorable decision or treatment.

WHAT ARE FACILITATION PAYMENTS?

Facilitation payments are small payments made to low-level and low-income officials in order to expedite a service that you are entitled to. A common example is facilitation payments demanded at border crossings, where officials will hold up a shipment until payment of a surcharge is received. At NA-KD, we never make such payments.

ABOUT GIFTS, MEALS AND ENTERTAINMENT

We only accept gifts that are:

- › Reasonable, appropriate and have a legitimate business purpose
- › Modest in value
- › Intended for a large group of employees
- › Symbolic, such as a mug, a small branded item, a pen or garment

We never:

- › Accept gifts in cash
- › Request gifts, hospitalities, or travels from third parties
- › Ask a third party to give gifts, hospitalities, or travels on our behalf
- › Accept gifts given in exchange for some action/business decision
- › Accept gifts that are not modest in value
- › Accept or give gifts in forms of stocks or securities
- › Give to anyone all aforementioned types of gifts



CONFLICTS OF INTEREST

As NA-KD:ians, we have an obligation to work in the best interests of the company, and to avoid or disclose situations where our private, financial or other external interests conflict with our job responsibilities. In some cases, just the appearance of a conflict may damage our reputation or effectiveness. Decisions should be made in the best interest of our business and our customers.

What does this mean for you?

- › You need to understand how to recognise conflicts of interest. The line between personal and professional interests is sometimes difficult to distinguish. Potential conflicts that require disclosure can include:
 - A close relationship with someone you supervise or might hire
 - Taking a side job with a supplier, other business partner, or competitor, especially if you work full-time at NA-KD
 - If a family member takes a job with a supplier or competitor, especially if in a key decision-making role
- › If you believe that you may be facing a conflict of interest or the appearance of one, disclose it immediately to your manager

MONEY LAUNDERING

At NA-KD, we are committed to prevent the use of our financial transactions from those who might abuse them. We therefore comply with anti-money laundering, financial crime and antiterrorisms laws in all countries where we operate.

What does this mean for you?

- Proactively perform appropriate due diligence and screenings. By being vigilant and looking out for any red-flag indicators, you will help to protect the business from the risks of money laundering. Red flags may include the following type of requests:
 - Payments in cash
 - Payment request to or from entities or countries not related to a transaction
 - Unusual fund transfers requests to or from foreign countries
 - Unwillingness or avoidance from business partners of providing information about their business. This could be concealing owner information, beneficial business partners or who their client is

WHAT IS MONEY LAUNDERING

Money laundering is a process by which funds generated through criminal activities – such as terrorisms or tax evasion – are moved through legitimate business in order to conceal its illegal origin. Money laundering is therefore the illegal process of making 'dirty' money appear legitimate.

PROTECT CONFIDENTIAL INFORMATION

At any moment, we may be exposed to material, non-public information about NA-KD or partners we conduct business with that is still unknown to the public. We all have an obligation to protect any such confidential information.

What does this mean for you?

- Never post company-confidential information on social media
- Do not discuss confidential information in public places or leave confidential material unattended, even in the office
- Protect the confidential information that suppliers, business partners, and others share with us
- Remember that your obligation to protect confidential information may continue also after you have left the company
- Comply with local expense report procedures and instructions; do not claim private expenses as business expenses

DATA PRIVACY

As a consumer-facing business, our customers entrust us with their personal information. It's therefore our responsibility, towards our customers but also partners and colleagues, to take all appropriate steps to safeguard and protect personal information about any individuals from misuse. We observe all applicable privacy laws when we collect, store, use and share personal information about individuals.



What does this mean for you?

- ▶ Do all you can to secure and protect personal information and ensure its integrity and availability. Follow company guidelines when collecting, storing, using, or sharing personal information about individuals
- ▶ Do not access personal information stored on our systems, except for business purposes that reflect the scope for which the information was collected
- ▶ Use strong passwords and do not share your individual passwords
- ▶ Use your company email account for all work communications – do not use personal email accounts to conduct company business
- ▶ Never share personal information with unauthorised people outside the organisation or with colleagues inside the organisation who do not have the need to know
- ▶ Always warn your manager or the legal team if you have access or know someone who has access to personal information that is not needed for their job
- ▶ Delete any personal information once the information is not needed for business purposes any longer
- ▶ If you are not sure whether or not you are dealing with personal information, kindly ask your manager, HR or the legal team

WHAT'S PERSONAL INFORMATION?

Personal information means any information relating to an identified or identifiable natural person. The most common types of personal information include:

- ▶ Email addresses
- ▶ Telephone numbers
- ▶ IP-addresses
- ▶ Payment information
- ▶ ID number
- ▶ Address

INSIDER TRADING

Working at NA-KD, you may come across inside information that relates to the value of our company. Any time you have access to inside information, you are subject to legal and regulatory duties; violation of these duties may constitute a criminal offence. Inside information includes any information about our processes, products, innovation, and financial or strategic plans or position. For example:

- ▶ Release of a new product/service
- ▶ Major operational risks or disturbances in the production system
- ▶ Unexpected considerable changes in financial results
- ▶ Knowledge of legal disputes or government investigations
- ▶ Gain or loss of a substantial clients/suppliers
- ▶ Knowledge about an upcoming merger or acquisition

What does this mean for you?

- ▶ You never buy or sell any securities based on inside information
- ▶ You do not give third parties a “tip” regarding inside information
- ▶ You do not recommend or suggest that anyone else trade in the securities of any company based on inside information even if said information is not disclosed

OUR BUSINESS RELATIONSHIPS

At NA-KD, our business relationships should be built on business acumen, mutual respect and transparency. Our business partners are key to us, regardless if they are suppliers, retailers, sub-contractors or creatives, and our relationships should always be honoured on the same level. We expect all our business partners to share our commitment to environmental and social sustainability.

What does this mean for you?

- ▶ We seek, evaluate and select business partners not only on objective factors such as design, quality, delivery, price and reliability but also on their commitment to environmental and social performance and development
- ▶ Always strive to support our business partners to reach their goals. If they reach their goals, we are more likely to reach ours
- ▶ If we need to deviate from our regular procedures in our business relationships, this should be communicated in a timely and transparent manner



COMMUNICATING TRANSPARENTLY AND RESPONSIBLY

In all our communications, both written and spoken, we are committed to being transparent, truthful and accurate, within the limits of commercial confidentiality. We want to report in a transparent, truthful, and timely manner in order to convey a true view of NA-KD's performance. We report financial transactions in accordance with generally accepted accounting practices. We report truthfully and transparently on any non-financial information that we are communicating. Our tax management complies with relevant standards and legislation and is based on prudence, timeliness and made in the spirit of applicable law.

What does this mean for you?

- ▶ Be honest and accurate when you report or record information about our business
- ▶ Product information should be clear and accurate and sufficient to enable customers to make informed decisions
- ▶ When making environmental claims for our products, the information must always be true and relevant and we shall be able to qualify and verify our claims
- ▶ We always put our customers first in our communication
- ▶ When creating user stories with our partners, do not forget to reach out to PR and Legal for approval
- ▶ Make sure you have the appropriate knowledge and understanding of the task you are performing and that you understand implications of possible mistakes in communication and reporting. If uncertain, consult your manager before performing the task
- ▶ When dealing with customers, always use fair business, marketing and advertising practices

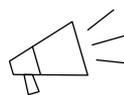
IMPLEMENTING THE CODE

The Code of Conduct is communicated to all NA-KD employees, interns, consultants and others working for, or on the behalf of, NA-KD. It is available on our [employee portal](#) together with our other policies. It is also publicly available on our [website](#).

As an employee, you must perform mandatory training on the Code of Conduct, with more in-depth training for all managers and employees working in higher risk environments. The training will be repeated on a regular basis – at least bi-annually. All new employees receive the Code of Conduct as part of the onboarding process.

If anyone fails to respect the Code of Conduct, reporting according to our Whistleblower Policy (and as outlined below) is expected. Depending on the severity and nature of the breach, appropriate action will be taken, including dismissal and legal consequences, if deemed necessary.

RAISE YOUR VOICE!



If you know about something that doesn't seem right, or which violates NA-KD's Code of Conduct, we want you to raise your voice. Often, early reporting can help resolve an issue quickly and minimise harm. Of course you can be 100% anonymous if you want to!

▷ HOW DO I RAISE A CONCERN?

First, talk to your manager, or your manager's manager
Or, talk to the relevant part of the organisation like HR, compliance or CSR
If any of the above is not possible, use the whistleblower function available [here](#).

▷ CAN I REPORT ANONYMOUSLY?

Yes, as long as anonymous reports are permitted by local law.
However, we encourage you to identify yourself when making a complaint. This allows NA-KD to get all facts, properly investigate your report, and enter into a confidential dialogue with you. Even if you identify yourself, every effort will be made to keep your identity strictly confidential within the company.

▷ WHAT HAPPENS AFTER I RAISE A CONCERN?

Once you make a report, NA-KD will investigate the situation and take appropriate actions. If you raise a concern in good faith, NA-KD will not tolerate any retaliation against you. This is true regardless of the outcome of the investigation.
To learn more about how to raise your voice and "blow the whistle" please see our [Whistleblower Policy](#).

NA-KD

CODE OF CONDUCT