

HVEG

INVESTMENTS B.V.



Code of Conduct

This Code of Conduct describes the minimum standards of business conduct which we see as fundamental in our dealings with merchandise suppliers. We expect all our business partners – from the component sourcing through to the final garment production process – to fully comply with the following standards. Just as we do ourselves.

We consider ourselves responsible for all of the activities carried out in our name worldwide. We feel a particular responsibility to provide decent working conditions for the employees producing our products. We acknowledge that this responsibility extends to all employees who make products for HVEG Investments B.V., regardless of whether they are directly employed by HVEG Investments B.V., i.e. Fashion Linq B.V., Belt Fashion B.V., Wink Accessories B.V., Link Ningbo Trading Co.Ltd., Fashion Connections Textilhandels GmbH, Menino Modevertrieb GmbH (hereafter called its subsidiaries) or by third party subcontractors and suppliers.

We want to work in compliance with national and international applicable laws and regulations. Moreover we have set social and environmental criteria based on the conventions of the International Labour Organisation (ILO) and UN Conventions. We ask our suppliers to support us in our CSR program and to work according to the standards set below. The Code of Conduct should not be used against employees in any way.

Whenever it becomes apparent that a supplier does not act in accordance with the requirements set out in this Code of Conduct, we will not hesitate to end our business relationship with this supplier (including the cancellation of any outstanding orders) if the supplier does not immediately take the necessary corrective action in order to ensure compliance with the Code of Conduct.

Legal Compliance

All our employees and business partners are to abide by the national and international laws and regulations that apply to the business that is conducted.

Prohibition of Child Labour

ILO Conventions 10, 79, 138, 142 and 182 and Recommendation 146 and CRC, art. 32(1)

The use of child labour will not be tolerated. "The age for admission to employment shall not be less than the age of completion of compulsory schooling and, in any case, not less than 16 years." "There shall be no forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour. Children in the age of 16-18 shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety or morals.

Non-discrimination

ILO Conventions 100, 111, 143, 158, 159, 169 and 183.

No discrimination shall be tolerated in hiring, remuneration, access to training, promotion, termination or retirement based on gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in workers' organisations including unions, political affiliation or opinions, sexual orientation, family responsibilities, marital status, or any other condition that could give rise to discrimination.

Prohibition of Forced and compulsory Labour and Disciplinary Measures

ILO Conventions 29 and 105

There shall be no use of forced, including bonded or prison, labour. All forms of forced labour, such as lodging deposits or the retention of identity documents from personnel upon commencing employment, are forbidden as is prisoner labour that violates basic human rights.

Freedom of association

ILO Conventions 11, 87, 98, 135 and 154

The right of all workers to form and join trade unions and bargain collectively shall be recognised. The company shall, in those situations in which the right to freedom of association and collective bargaining are restricted under law, facilitate parallel means of independent and free association and bargaining for all workers. Workers' representatives shall not be the subject of discrimination and shall have access to all workplaces necessary to carry out their representation functions.

Working Hours

ILO Conventions 1 and 14 and ILO Recommendation 116.

Hours of work shall comply with applicable laws and industry standards. In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

Compensation

ILO Conventions 12, 26, 101, 102 and 131

Wages and benefits paid for a standard working week, overtime hours and overtime differentials shall meet or exceed legal minimums and/or industry standards and always be sufficient to meet basic needs of workers and their families and to provide some discretionary income. Illegal, unauthorised or disciplinary deductions from wages shall not be made. Deductions from wages as a disciplinary measure are forbidden, unless this is permitted by national law and a freely negotiated collective bargaining agreement is in force. All employees should be made aware of their payment conditions before they commence their employment and receive a copy of their labour contract.

Workplace Health and Safety

ILO Convention 155

A safe and hygienic working environment shall be provided, and best occupational health and safety practice shall be promoted, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Appropriate attention shall be paid to occupational hazards specific to this branch of the industry and assure that a safe and hygienic work environment is provided for. Effective regulations shall be implemented to prevent accidents and minimise health risks as much as possible. Physical abuse, threats of physical abuse, unusual punishments or discipline, sexual and other harassment, and intimidation by the employer is strictly prohibited.

Environment and safety compliance

Procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, emissions and effluent treatment must meet or exceed minimum legal requirements.

Management System

The supplier company shall define and implement a policy for social accountability, a management system to ensure that the requirements of the Code of Conduct, Environmental and Human Health criteria can be met as well as established and follow an anti-corruption policy in all of their business activities. Management is responsible for the correct implementation and continuous improvement by taking corrective measures and periodical review of the Code of Conduct, as well as the communication of the requirements of the Code of Conduct to all employees. Audits can be held by us or by our customers to inspect the improvements in the factories and compliance with this or other Codes of Conducts.

HVEG Investments B.V. and its subsidiaries may adhere to additional standards through acceptance in writing of a Code of Conduct as used by a third party. The applicability of a third party Code of Conduct shall never in any way affect the standards contained in this Code of Conduct.

HVEG Investments B.V. January 2012

Addendum: Modint Recommendations for Restricted Substances List. Modint is the trade association for fashion, interior design, carpets and textiles.

You can find the latest legally binding Modint Recommendations for Restricted Substances list (in red) on our website: www.hveg.nl

Suppliers declaration

The undersigned hereby confirm:

- That we have received and taken note of the HVEG Code of Conduct of January 2012 and the Modint Recommendations for Restricted Substances list.
- That we will comply with the HVEG Code of Conduct and the legally binding Modint Recommendations for Restricted Substances list (in red) and the updated versions on the HVEG website: <http://www.hveg.nl>
- That we inform HVEG Investments B.V. or one of its subsidiaries of all business premises used for the production of goods for HVEG Investments B.V. or one of its subsidiaries and comply throughout the entire process with the HVEG Code of Conduct.

Date

Name of Company

Signature

Company Stamp/Seal

Name

Country

This document must be signed by a duly authorised representative of the company and returned to your contactperson at HVEG Investments B.V. or its subsidiary