



# Business Code of Conduct

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\*Wherever a masculine pronoun is used, one may also read the feminine.

How do we translate these core values into daily activities? This Business Code of Conduct was drawn up specifically to help with this.

The concept of a Business Code of Conduct is not new to MSNL B.V. The present document, however, is. The old code was completely revised by MSNL B.V. to reflect our core values, the changing position of our organisation and the current expectations of society.

The Business Code of Conduct is an important cornerstone of our common culture. The code explains what MSNL B.V. stands for.



Jaco scheffers  
CEO

## **Privacy**

We respect the privacy of our customers and employees and protect their personal details. Our activities enable the collection of information about customers, suppliers, competitors and others. We treat this information confidentially and use it exclusively for acceptable business purposes of MSNL B.V. , observing all applicable regulations.

MSNL B.V. has drawn up a privacy agreement. You can find it both at the HR department and in the HR procedures handbook. This agreement provides a better insight for management and staff into the rules for handling personal details of employees under the Personal Data Protection Act.

## **Gifts / invitations**

The general rule is that MSNL B.V. employees may not accept or give any gifts. By 'gifts', we mean not just products, but also services, entertainment, tickets to sports events and so on. In short: everything that is given voluntarily and that represents a certain value to the recipient.

There are cases where refusing a gift may embarrass or insult the person offering it. This could be the case, for instance, when you visit a foreign country where people offer a gift as part of a public ceremony. In such cases, accepting the gift is permissible, provided that you report it to your supervisor. When in doubt, consult the Compliance Officer. Every situation will be assessed individually in this respect.

The employee must always pay for his own dinners, unless the supervisor or management have approved that the company or the other party pay for it. Invitations to trips or events may only be accepted with the approval of the supervisor or management.

We expect our suppliers and other business partners to refrain from offering gifts to our employees or to third parties with the intent to influence them. If we find that they do not refrain from this, we may decide to terminate the commercial relationship. It is never permitted to offer or accept a bribe.

## **Theft and fraud**

Cases of internal fraud will result in summary dismissal and prosecution. The employee in question will furthermore be listed in the internal and/or warning register of the Retail Fraud Elimination Foundation (Stichting Fraude Aanpak Detailhandel).

It is MSNL B.V. policy to immediately investigate and report all cases of internal and external theft relating to MSNL B.V. and where applicable to prosecute.

## **Administration**

The management is to ensure that all relevant transactions and other actions are recorded correctly, accurately and truthfully in the company's administration.

## **Conflicts of interests**

We depend on the trust of our customers, suppliers and other third parties. Conflicts of interests, even the appearance of conflicts of interests, undermine MSNL B.V. 's good reputation.

Conflicts of interests arise in situations in which an employee uses his contacts or position within the company to serve personal, professional or financial interests, whether or not detrimental to the company. Any situation where a conflict of interest (or the appearance thereof) might

### **3. Doing business**

#### **Customers**

Our customers determine our success. This is why our basic principle is that we do everything we can to fulfil or surpass our customers' wants and needs. We offer excellent service to our customers and are always open to complaints, comments and advice.

#### **Competition**

We do business on the basis of honest and ethical operations, good faith and integrity. We expect the same from everyone we do business with. Competition laws are meant to promote free and honest competition. MSNL B.V. complies with these rules. MSNL B.V. employees may not exchange any information with competitors relating to prices or market shares if such would result in a violation of the competition laws.

## **5. Working conditions and working environment**

### **Basic principle**

Our management style focuses on creating circumstances in which our employees feel involved with and responsible for their work. MSNL B.V. provides good, safe and healthy working conditions.

As we strive to maintain a culture based on integrity, trust and individual responsibility, MSNL B.V. offers its employees a safe and fair way of reporting behaviour that does not comply with this Business Code of Conduct. It is also possible to report certain or expected violations of the laws, rules and regulations that apply.

### **Discrimination**

The staff policy at MSNL B.V. does not permit any discrimination, whether related to religion, philosophy of life, political persuasion, race, gender or anything else.

### **Intimidation and bullying**

Sexual intimidation as well as any other type of intimidation and bullying are unacceptable. Managers must be alert to possible cases of intimidation and bullying, immediately report any such situation to the Compliance Officer, and end the situation as soon as possible. Complaints/reports can be submitted to the supervisors, HR Adviser, Complaints Committee or the Compliance Officer. When MSNL B.V. receives such a report, we will start an investigation and, if necessary, take appropriate measures. MSNL B.V. has drawn up a notification procedure. You can find it both at the HR department and in the HR procedures handbook.

### **Drugs and alcohol consumption**

We expect our employees to behave appropriately at all times. This means, among other things, that the use of alcohol or drugs at work and during working hours is strictly prohibited. It is also not permitted to come to work under the influence of alcohol and/or drugs. Violating these rules forces MSNL B.V. to take disciplinary measures. Drinking alcohol (in moderation) is permitted during business dinners.

### **Freedom of association**

Employees have the right of association and collective negotiations. They may also be a member of a union or works council.

### **Secondary activities**

We believe it is a good thing for our employees to have secondary activities, provided that these activities do not conflict with the interests of MSNL B.V. Employees should inform the company in writing which secondary activities they perform. If these activities are to take place alongside the employee's daily work, the employee should consult with the management.

to be paid at a premium rate. Having worked six subsequent days, workers are entitled to at least one day off.

### **The workplace is safe and healthy**

The supplier shall take effective measures to prevent workers from having accidents, injuries or illnesses arising from or associated with work. A package of regulations and procedures must be drawn up that provides for all health and safety aspects at work, especially the provision and use of personal protective equipment, access to clean toilet facilities, access to safe drinking water and safe and clean eating and resting areas. If appropriate, sanitary facilities for food storage shall be provided. The supplier shall respect the workers' right to exit the premises from immediate danger without seeking permission. Working methods as well as conditions in dormitories that violate basic human rights are strictly prohibited.

### **Child labour is prohibited!**

Child labour is strictly prohibited. The supplier shall not employ, directly or indirectly, any person under the age of 15 years or under the age of completion of compulsory schooling (whichever is higher), unless the exceptions recognized by the ILO apply.

Suppliers must establish robust age-verification mechanisms as part of the recruitment process, which may not be in any way degrading or disrespectful to the worker. In the event that children are found to be working in situations which fit the definition of child labour above, policies and written procedures for adequate remediation shall be established by the supplier. Special care is to be taken when removing a child from the work place, as they can move into more hazardous employment. The supplier shall identify measures to ensure the protection of the affected child during the remediation process.

### **Young workers will receive special protection**

Young workers, who are 15 years or older but less than 18 years of age and who are no longer subject to compulsory full-time schooling under national law, shall receive special protection. The supplier shall ensure that young workers do not work at night and that the kind of work is not likely to be harmful to their health or development. Their working hours shall not affect their attendance at school or at other training or instruction programs.

### **There is no precarious employment**

Before entering into employment, the supplier will provide workers with understandable information about their rights, responsibilities and employment conditions, including working hours, remuneration and terms of payment. The supplier shall ensure that their employment relationships are documented and that they do not cause insecurity and social or economic vulnerability for their workers.

### **There is no forced labour**

The supplier shall not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour. The supplier will risk allegations of complicity if they benefit from the use of such forms of labour by their business partners. The supplier shall act with special diligence when engaging and recruiting migrant workers both directly and indirectly.

Lodging deposits or the retention of identity documents from workers upon commencing of employment is strictly prohibited. The supplier shall allow workers the right to leave work and

## **7. Society, environment and safety**

MSNL B.V. is fully a part of society, and we aim to do business in a socially responsible manner. To that end we have drawn up a number of targets, which are briefly explained on the following pages.

### **Working conditions in supplier-owned factories**

MSNL B.V. will make sure that all suppliers are tested with respect to the working conditions at their production sites. Also refer to chapter 6.

### **Use of sustainable materials**

Wherever possible, we will aim to use sustainable materials. Wherever possible and in cooperation with manufacturers and suppliers, we actively seek environmentally friendly alternatives in addition to the existing product range, also keeping in mind the environmental strain involved with the materials.

We aim to make sure that all clothing we sell is free of harmful substances. Evolving understanding of the possible harmfulness of substances may mean that a substance considered safe today could be suspect tomorrow. We do everything we can to use only materials that are safe to people and the environment. When there is a well-founded suspicion that certain substances are not safe, we will look for a safe alternative in cooperation with our manufacturers and suppliers.

Our products and the materials for our products are produced in an animal-friendly manner. Our products do not contain animal fur.

### **Health and safety of our customers and employees**

We aim to have an approved and tested recall procedure in place. We strive for all of our clothing to comply with national and international regulations applicable in the respective countries. We aim to make certain that all our employees are familiar with our safety procedures (emergency information, business emergency plans). Our activities are labourintensive and mainly take place in rooms that should be easily accessible to large groups of customers. Where many people get together, safety is crucially important. This is why creating safe working and shopping conditions for both our employees and our customers has our continual attention.

### **Energy savings**

MSNL B.V. will draw up an Energy Savings Plan and aims for continuous energy savings.

### **Waste management**

MSNL B.V. keeps files on packaging in order to monitor the amount of packaging waste introduced to the Dutch market. Our objective is to structurally reduce environmental strain, both in the production stage and the consumption stage as well as the waste stage. Considering the fact that the retail sector is an important link between manufacturers and suppliers on the one hand and consumers on the other, we are well-positioned to make



## **8. Compliance**

### **Employees**

Retail is a human job. In this labour-intensive sector, quality, the efforts of employees and attention to customers are key to the operations. This is why it is essential that our employees treat people, and are treated, with integrity. That means that they should be familiar with the Business Code of Conduct and act accordingly. If these standards are not properly complied with, the employees not only harm themselves, but also their colleagues and MS Mode as a whole. Violation of this Business Code of Conduct may result in disciplinary measures, including termination of employment.

### **Suppliers and other involved parties**

As explained in chapter 1, we also expect our suppliers and other business partners to comply with the principles of this Business Code of Conduct. If we find that this Business Code of Conduct is violated, we reserve the right to terminate the commercial relationship, if necessary with immediate effect.