

# Desigual's Code of Ethics.

Desigual.

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# Letter from our President.

Since 1984 we have been growing, improving and transforming ourselves. We have also matured, but we have always retained the same identity which defines us and allows us to continue to be different as a brand and a company.

There is no doubt that Desigual's raison d'être is to contribute—through our product, our communication, our teams and our actions—towards making a positive impact on the lives of those with whom we interact. Our energy and way of doing things spreads to our customers, our employees, our collaborators and our suppliers, and we always try to surprise them with our creativity and the care we put into every detail.

Our purpose as a company inspires us to take things a step further: we want the world to become a better place through our unique creations, a place where people can express their authenticity. Our values are the starting point: care, vitality, non-conformism and change rule the way we act, the way we live and the way we understand Desigual. Therefore, it is essential that they guide every one of our actions and decisions, regardless of the position we occupy within the company. I know for a fact that our success depends on every single person who makes up Desigual, and also on our daily interactions with the world around us. Acting responsibly and respectfully; building beneficial and powerful relationships; never conforming and always looking for a different (and better) way to do things; learning from our mistakes and those of others; and, ultimately, having a positive attitude is what makes it possible for Desigual to fulfil its purpose.

This Code of Ethics that you have in your hands will help us to refresh our DNA, to define it, redefine it and keep it alive and in good shape. It will help those of us who have been working together for a few years to work better, to convey our commitment to the people who have just got to know us and, in the future, to remind us who we are and what we stand for.

This Code is dedicated to every person who has been part, is part and will be part of Desigual.

This Code of Ethics is for you.

**Thomas Meyer**

# The purpose of this Code.

This Code is intended to establish the ethical criteria and guidelines for responsible action that steer and inspire us as we carry out our roles. It is an essential element of Desigual's corporate culture, and a fundamental pillar upon which we build our relationships with our groups of interest.

This Code is a crucial tool for promoting and applying our values and culture, which are based on respect and the observance of human, social and labour rights.



## To whom it applies.

This Code applies to all companies that operate under the Desigual brand; it binds governing bodies, the management and internal collaborators, which includes employees as well as interns and student apprentices. It also applies to external collaborators who have a direct or indirect commercial relationship with Desigual, regardless of their type of contract, especially in the case of suppliers.

This Code may also apply to other physical or legal persons, if required. Nobody is exempt from complying with this Code, except in exceptional and fully justified circumstances, and always with the prior authorisation of the Ethics Committee and other competent bodies within Desigual.

It is our responsibility to understand the content contained herein and to observe and comply with its principles, guidelines and procedures as we perform our daily work at, with and for Desigual.

# The principles that inspire it.

This Code of Ethics is inspired by the following general principles:

- Our activities must be developed through **integrity, ethics** and **responsibility**.
- As Desigual and collaborators, our actions must be guided by respect towards the general principles contained in this Code and compliance with the applicable law in every country where we operate.
- All persons engaged in a professional, financial, social and/or industrial—whether direct or indirect—relationship with Desigual must be treated fairly and with respect, in full compliance with human rights.
- All of Desigual's activities must be conducted in a way that is respectful towards the environment and favours the protection of biodiversity and the sustainable management of natural resources.





# Our commitments.

## Compliance with regulations

We are present in more than 100 countries and our spirit is international. So it is essential that we commit to complying with the law that is in force in each of the countries where we operate, as well as any internal rules, instructions and procedures approved during our operations.

All our policies, protocols and codes of conduct must be aligned with the principles and criteria established in this Code, which means they must always be approved by the Ethics Committee and/or any other competent internal bodies.

In the event of conflict or contradictions, this Code will always prevail, except in those cases where the policies, protocols and codes of conduct are more restrictive.

Desigual commits to communicating the content of this Code in a clear and transparent manner, and will ensure that every person to whom it applies knows and understands it.

In turn, those to whom this Code applies are obliged to inform Desigual of any irregularities of which they may be aware and which, in their own judgment, could violate or breach the principles and rules contained within this Code and all other internal policies, protocols and codes. Said communications must be carried out through the Whistleblower Channel that Desigual makes available to everyone to whom this Code applies, while guaranteeing their anonymity and confidentiality, as established in a later section of this Code.

## Our employees and collaborators

We are inspired by respect and the authenticity of people, and therefore no employee of Desigual can be subject to discrimination on the grounds of race, gender, sexual orientation, age, nationality, religious beliefs, political opinions, social background, physical or mental disabilities, or any personal or social situations.

We promote relationships that are based on dignity, participation and collaboration of people, while taking cultural diversity into account. Therefore, at Desigual we will not tolerate any form of physical, sexual, psychological or moral harassment or abuse, nor any other behaviours, attitudes or comments that intimidate or offend others or that could create an intimidating or hostile work environment.

We advocate and promote compliance with human and labour rights, and therefore we commit to strict compliance with labour regulations and to promoting the prevention, detection and elimination of any irregularities in this regard.



We promote the equality of opportunities and diversity, and therefore we strive to ensure that access to work and professional promotions for everyone working at Desigual is always linked to merit, quality of work, achieving targets and a self-demanding attitude.

We promote a healthy, inspiring and creative work environment, which is why we help our people to strike a healthy balance between their professional and personal lives.

Our remuneration policy aims to be fair, appropriate to the duties we perform and to our contribution towards achieving the goals set by Desigual.

We make it our priority to ensure that we all operate in workplaces that are healthy and safe, which means that we comply with prevention measures, health and safety regulations and are continuously striving to improve working conditions.

We safeguard our health and safety and that of all our employees and collaborators as they carry out their work. Therefore, we promote the prevention, detection and eradication of any irregularities in this regard that may affect proper compliance with professional obligations.

At Desigual we have the right to unionise, to freedom of association and to collective bargaining, as is provided for in the current labour regulation.

## **Our clients and consumers**

At Desigual, the customers are at the centre of all our decisions. As a result we are



committed to offering them a product that respects high standards for quality, health and safety, while committed to offering them a product that respects high standards for quality, health and safety, while guaranteeing that none of our items pose any risks to health and/or safety while in use.

We always respect the regulations and standards that apply to our relationships with our consumers, and we constantly strive to offer them a product that is manufactured ethically and responsibly by our suppliers.

Our relationship with our customers is based on criteria related to consideration, respect and dignity, taking into account the cultural sensitivity of each individual. We do not tolerate any discriminatory treatment in terms of race, religion, age, nationality, gender, sexual orientation or any other personal or social situation, as is prohibited by law.



We commit to communicating with our customers in a clear and transparent manner, promoting our products and services on the basis of objective standards, without falsifying their terms or characteristics. We take care to ensure that our promotional activities are carried out in a clear manner, with the aim of guaranteeing that we do not provide false or deceitful information, or information which could mislead our customers or third parties.

Our marketing campaigns seek to inspire our customers, convey our values and brand purposes, and provide a unique and different experience. Therefore, our promotional and marketing supports depict people who are proud of their authenticity, diversity and style, while avoiding creating stereotypes that are distant from the reality of the population.

We strive to safeguard the safety of our customers, with regard to their personal safety in our stores (prevention and action in the event of an emergency or accident) and also the methods of payment used in our physical and online stores, as well as our invoicing and collection procedures, data protection and fraud prevention.

## The market

We always try to maintain a loyal and respectful relationship with every participant and competitor within the market, which means we do not tolerate behaviour that is deceitful, fraudulent or contrary to good faith, or the dissemination of malicious or false information about others.

We carry out our commercial and market research without breaching any applicable



regulations, including those related to confidentiality, and we reject all information that is not obtained in this manner. We pay particular attention to ensuring that we do not violate commercial or business secrets.

## Our suppliers

We interact with our suppliers—both product manufacturers and all other suppliers of goods and services—in a way that is lawful, ethical and respectful, and we also work closely with them to ensure that they comply correctly with this Code and Desigual's Code of Conduct for Suppliers, to which they are bound.



The selection of our suppliers is performed in accordance with objectivity and transparency criteria, and combines our interest in obtaining the best terms with the convenience of having stable relationships with ethical and responsible suppliers. During selection, we pay particular attention to the rules and processes related to certification, tendering, inspection and verification, to which our suppliers must comply.





We strive to ensure that all suppliers working with Desigual commit to respecting the human and labour rights of all their employees, and applying and conveying these principles to their business partners. All relationships with suppliers are made official through the corresponding collaboration agreements and contracts issued by Desigual.

As Desigual employees or collaborators, we cannot offer, promise, grant, request, receive or accept, either directly or indirectly, any presents, gifts or donations, benefits, advantages, favours or compensations, either in cash or in kind, regardless of their nature, to or from a physical or legal person with whom Desigual has a relationship of any kind.

We commit to understanding and appropriately assessing local practices in order to protect the interests and good reputation of the company at all times.

## **Our shareholders**

Our purpose is to make the world a better place by allowing people to express their authenticity through unique creations. To do this, it is essential that we carry out our activity in accordance with the corporate social interest, achieving long-term objectives for profitability and sustainability, promoting the continuity of the business, the maximisation of economic value and a strong financial position.

Our activity is focused on creating value for our shareholders by adopting the best practices of corporate governance and by conveying an accurate and truthful image of the circumstances of Desigual.





## **Administrations and public institutions**

We interact with administrations, public institutions and other authorities in a way that is lawful, ethical, respectful and aligned with the international provisions in place for the prevention of corruption and bribery.

Furthermore, as Desigual employees or collaborators, we cannot offer, promise, grant, request, receive or accept, either directly or indirectly, any presents, gifts or donations, benefits, advantages, favours or compensations, either in cash or in kind, regardless of their nature, to or from any authority or public officer, that will put Desigual in a privileged situation or provide a competitive advantage over others.

At Desigual we comply with our tax and Social Security obligations. Furthermore, we ensure that any subsidies requested or granted by public administrations are put to good use and that requests are transparent, thereby preventing the falsification of the terms of securing said subsidies or the possibility of using them for purposes other than those intended.

We commit to collaborating with public administrations in the event that the company is involved in an inspection procedure.

## Conflict of interests

We commit to preventing any real or potential situation that may cause a conflict between our personal interests and those of Desigual. We must refrain from representing Desigual in personal matters and from intervening in or influencing any decisions made by Desigual in which we have a personal or familial interest, directly or indirectly. We must refrain from using our position within the company to obtain assets or personal advantages, or to benefit as individuals from business opportunities.



## External activities

We promote creativity, we are dynamic and non-conformist. We like to inspire and be inspired, we look for new experiences and we innovate. Everyone who works at Desigual has the freedom to engage in diverse activities outside of their working hours, and their private lives and political freedoms are completely respected. However, at Desigual we always encourage our people to ensure that said activities respect the values and principles that have inspired this Code.

Our business model does not interfere with the political situation of the communities where we develop our manufacturing, distribution and/or sales operations. Any relationships with governments, authorities, institutions and political parties are based on respect of

the principles of legality and neutrality. If any contributions, monetary and/or in-kind, are made to political parties, institutions or public authorities, they will always comply with the current laws and ensure transparency; for this purpose they will be preceded by a mandatory report that con rms total compliance with the law.



## Use of Desigual assets, services and systems

We commit to making efficient use of the services, assets, equipment and systems that Desigual puts at our disposal for the execution of our duties, and using them according to the internal rules, while always refraining from making use of them for illicit purposes or for our own personal benefit.

At Desigual we are digital, which means that we are particularly concerned with protecting the security of Desigual's information systems. To achieve this, we must not share passwords, attempt to modify or alter security elements, or install or use applications which are illegal or may harm the assets or information systems of Desigual.

These principles and usage criteria also apply and are binding for our suppliers with regard to the goods, equipment and systems that we put at their disposal within the context of our relationship.



## Information processing and personal data protection

We consider information to be one of our main assets, which means that it must be subject to special protection. We declare the truthfulness of information as a basic principle of all our actions, which means that any information entered into our systems must be true, accurate and reliable. Furthermore, as an organisation we are cognisant of the security and confidentiality of information and the protection of personal data, and we make it a priority to comply with the current laws regarding security and the protection of personal data.

We commit to maintaining confidentiality and using any data, information or documents obtained through our work at Desigual, appropriately and in accordance with the

law. We are also obliged to protect the information and knowledge generated within the organisation, or that which the organisation owns or is safeguarding.

We commit to respecting the privacy and personal and familial intimacy of everyone whose data we have access to, whether they are employees, customers, suppliers or otherwise. Data usage authorisations must respond to specific and justified requests. It is our duty to strictly obey the internal and external rules that have been established to ensure that information and data provided by third parties are processed appropriately.

## Protection and defence of industrial and intellectual property

At Desigual we are committed to respecting, protecting and defending our own industrial and intellectual property and that of third parties. This includes identifying signs such as trademarks, commercial names, industrial designs, copyrights, domain names, utility models, inventions and software, among others.





We are responsible for the originality of our own designs and we ensure that our suppliers guarantee the originality of the designs that they make available to us. To achieve this, we adopt the necessary measures and controls to guarantee that said rights are being used within the law.

With regard to our marketing and advertising campaigns, we only use trademarks, identifying signs, images, graphics, text, illustrations and other materials for which our use has been duly authorised by the Communication and Marketing Department in accordance with regulations and internal procedures as well as the principles of this Code.

## Financial control

At Desigual we record all economic and financial transactions with clarity and accuracy in the corresponding accounting books, in a way that represents said transactions accurately. This includes entering financial information into the company's systems in a clear, complete and precise manner.

We commit to implement and maintain an adequate system for the internal monitoring of financial and accounting information, and to ensure the rigour and integrity of our financial information, which, in accordance with the applicable law, must be published for the market or entered onto the corresponding records.

Special monitoring and supervision is conducted in the event of payments made to or by third parties into accounts that are different from those recorded in our internal systems, those that are located in places classified as tax havens, and those for which the natural beneficiary is unknown. In these cases, we always follow the applicable regulations and internal procedures.



To achieve this, all Desigual employees and collaborators receive appropriate training, and auditors are provided with all records related to said information. fines ilícitos o en nuestro beneficio propio, y siempre ajustándonos en dicho uso conforme a la normativa interna.

## Our social and environmental commitment

Our social and environmental commitment during the development of our activities and for the benefit of our interest groups is a fundamental part of our business model in every community in which we are present.



Desigual's social commitment is defined in our Corporate Social Responsibility (CSR) plan, and includes the development of sponsorship, patronage and social action activities, which are carried out both internally by the organisation and channelled through our collaboration with social organisations.

We are committed to minimising the environmental impact throughout the lifecycle of our products, and to this end we develop, in every stage of the design, manufacturing, distribution, sale and end of use processes of said products, the necessary reduction and compensation measures.

As we develop our activities as Desigual employees and collaborators, we promote social and environmental sustainability as a means to create value with all our interest groups.

## Our criminal compliance programme

This Code is part of Desigual's regulatory compliance programme for the prevention of crime and includes the principles of said programme, the most notable of which are:

- Principle of due diligence.** The purpose of which is to prevent, detect and eradicate irregular behaviours. Among other aspects, it includes the analysis of risks, the definition of those responsible for said risks, the communication and training of employees and third parties directly related to Desigual in this matter, as well as the creation of the required protocols, manuals and procedures (especially those that are necessary to notify and immediately eradicate said irregular behaviours).
- Principle of criminal liability of legal persons.** The purpose of which is to prevent any behaviours that Desigual may be liable for among its legal representatives, advisors and/or administrators, employees, proxies or any other person subject to the authority of Desigual.



# Complying with this Code and the Ethics Committee.

Every person to whom this Code applies is responsible for understanding its content and observing and complying with its principles, guidelines and procedures in the development of their work at and with Desigual.

Breaching this Code may lead to legal liabilities of different natures (for instance, labour, civil, administrative and even criminal, depending on the nature and severity of the infraction), as is established in the current law and other applicable internal regulations of Desigual.

With regard to our suppliers, breaching this Code may lead to the termination of the relationship, agreement and/or contract that binds the supplier to Desigual, without prejudice to any other legal liability that may correspond according to the applicable law.



Regarding our employees, breaching this Code may lead to disciplinary measures, depending on the applicable disciplinary regime.

To ensure compliance with this Code, we have an Ethics Committee comprised of:

-  Two people from People First
-  Two people from Safety & Risk Prevention
-  The Legal Counsel and Compliance Officer

The Ethics Committee can act through their own initiative or at the request of any of Desigual's employees, manufacturers, suppliers or third parties who have a direct



relationship or a legitimate commercial or professional interest, by means of a good-faith complaint.

The Ethics Committee is accountable to Desigual's Executive Committee (COMEX).

The basic functions and responsibilities of the Ethics Committee are:

- a)** To supervise compliance with this Code and its dissemination to all persons who are bound by it.
- b)** To receive all kinds of texts, documents and information related to the application of the Code and ensure that they are forwarded, if applicable, to the body or department of the company that is responsible for managing and processing them in accordance with this Code and/or any other applicable internal regulations.
- c)** To control, supervise and record the processing of any incidents and records that may arise from the application of this Code.
- d)** To interpret and resolve any questions or conflicts that may arise regarding the execution and/or application of this Code.
- e)** If deemed appropriate, to bring to the attention of the Executive Committee (COMEX) any issues relating to the application of this Code.

In the exercise of its duties, the Ethics Committee guarantees:

- a)** The confidentiality of the information and records it manages and the actions carried out, except in those cases where said information must be revealed in order to comply with the law or to respond to a court requirement or order from a public authority.
- b)** The thorough analysis of all data, information and documents which require action.
- c)** To carry out an enquiry appropriate to the circumstances of the case, ensuring that, once the enquiry is over, the relevant parties are notified of the final decision or resolution. During the enquiry, the Committee must always act independently and respect the right to be heard and the presumption of innocence of the affected person.
- d)** The indemnity of complainants as a result of making a complaint or submitting a good-faith claim to the Ethics Committee.

The Ethics Committee is equipped with the necessary resources and means to guarantee the enforcement of this Code.

The decisions of the Ethics Committee are considered binding.

# Communication of the Code and enquiries.

Desigual puts this Code at the disposal of everyone it applies to. For employees, the corporate internal channels are used (corporate intranet, corporate email, print document, among other current and future means). For suppliers and other recipients, the usual communication channels agreed upon for this purpose are used. The above implies awareness and acceptance of the content by all parties involved.

Furthermore, Desigual commits to carrying out communication, training and awareness actions to ensure the correct understanding and enforcement of this Code, as well as any subsequent updated versions.

Recipients are advised to review the content of this Code regularly through the available channels. All parties are warned that ignorance of the content of this Code, whether complete or partial, does not imply exemption from compliance.

Any communications related to the interpretation or application of this Code, or to claims of irregularities or breaches of this Code may be sent to Desigual through the following means:

- **Enquiries about the interpretation or application of the Code:** by post (addressed to Passeig Mare Nostrum 15, 08039 Barcelona, for the attention of the Ethics Committee) or by email to the Ethics Committee ([ethicalcommittee@desigual.com](mailto:ethicalcommittee@desigual.com)).
- **Whistleblower channel:** by post (addressed to Passeig Mare Nostrum 15, 08039 Barcelona, for the attention of the Ethics Committee) or by email to Desigual's whistleblower channel: [integrity@desigual.com](mailto:integrity@desigual.com).





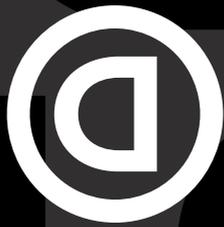
## Other internal codes and regulations.

This Code is complemented by other codes, protocols, policies and/or internal regulations, which may be completely or partially related, and which, due to their nature, may apply to all or some of us. For information purposes, the most important examples are listed below:

- Responsible use of technology. Regulations for the use of software, hardware, applications and devices
- Action protocol to prevent workplace violence
- Code of Conduct for Desigual Suppliers
- Safety rules and instructions

All our codes, protocols, policies and/or internal regulations are regularly reviewed to ensure they are updated and stay true to the principles by which they were inspired; as a result they may be modified and/or extended.

All codes, protocols, policies and/or internal regulations, including updated versions, which by their nature apply to employees, will be accessible through the corporate internal channels (corporate intranet, corporate email, print documents, among other current and future means). For suppliers and other recipients, they will be accessible through the usual communication channels agreed upon for this purpose.



[desigual.com](http://desigual.com)