



# **CODE OF CONDUCT**

## **WALKING WITH PURPOSE**



**A Little Better, Never Perfect**

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# A Little Better, Never Perfect



Miquel Fluxà

## Message from our CEO

Miquel Fluxà

I am pleased to introduce our Code of Conduct and Ethics. This code establishes the framework for our business and highlights the principles that have guided us since our inception more than 140 years ago.

Our values have been the cornerstone of our family business’ success and endurance, especially during challenging times. We believe in doing business the right way. That means making profit whilst simultaneously taking care of people and the planet.

Our Code of Conduct and Ethics spells out the rules we follow and the values we live by to make sure we’re always doing our best. It explains what it means to be Camper; the way in which we do business, and how we treat each person we encounter during our day-to-day work. We know that we can’t always be perfect, but our intention is to create a long-term sustainable business for everyone.

Miquel Fluxà  
CEO Camper Group





# What is a code of conduct?

Our Code of Conduct and Ethics is more than a rule book, it's a **set of guidelines that communicates how we should behave**, and how we expect those around us, the people, groups and partners we engage with to also behave.

It goes without saying that we should follow the norms and regulations where we operate. Our behaviours and ethics go beyond that. But following laws and acting with integrity means **doing the right thing**, even when no one is looking. This Code reminds us that we must always apply the highest standards possible.

# Who does the code of conduct apply to?

This Code of Ethics is applicable across the entire Camper Companies -Camper, NNormal, and casa camper. Whatever your role is within the Group you are equally responsible to try your best to uphold our brand and our reputation.

This Code is more widely applicable to any **STAKEHOLDER** and forms the basis of our Code of Conduct and Ethics for Suppliers.

**A STAKEHOLDER** is someone, an individual or an organisation, connected with our business. It includes suppliers, contractors, temporary employees, franchise partners, customers, clients and other organisations including banks. Anyone who affects or can be affected by our operations is included in this group.

# Walking the Talk: Living our values everyday

This Code of Conduct and Ethics aims to set and explain the standards we expect from everyone. In every decision and action, we ask that you always remember to:

- 1 . Live by our Mission & Values
- 2 . Comply with company policies.
- 3 . Speak up where you think we can do better.


Each company within Camper has its own unique DNA. These values, alongside moral and legal principles, set out how we should conduct ourselves each day.






# Walk with purpose

To excite people with a fun, sustainable, and responsible walking experience.



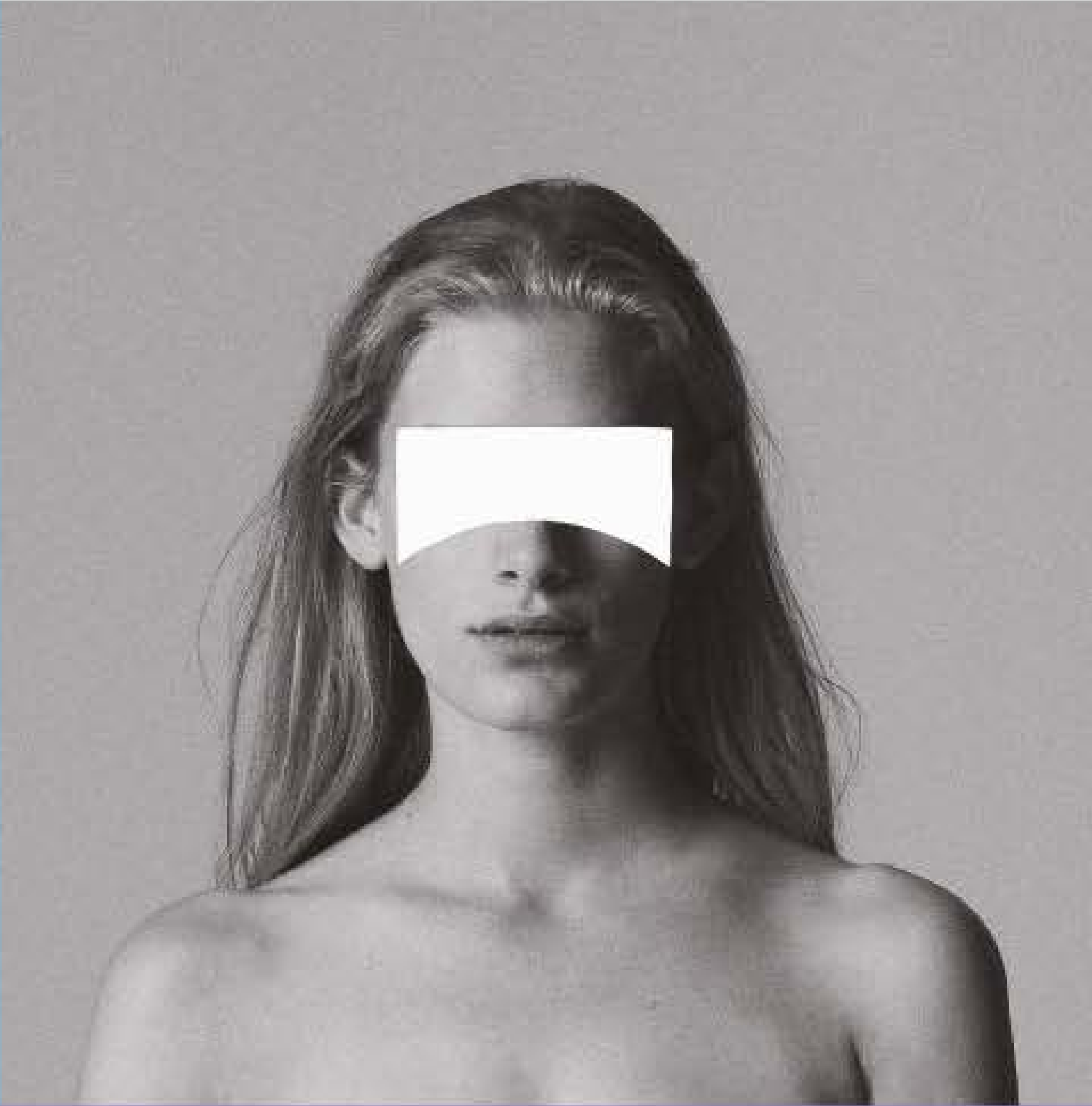
## AUTHENTIC


We have been shoemakers for over 140 years. Quality and craftsmanship remain at the heart of what we do. Quality and craftsmanship remain at the heart of what we do.



## FUN


Camper is from the Mediterranean. We take what we do very seriously, but we don't take ourselves too seriously. We walk, we don't run – "Walk, don't run" – and we will always try to add a smile to life.






## CREATIVE

Camper thinks differently and we want to be seen as different, but not in a loud and flashy way. We add that creative nod to everything we do: in the product, in the stores, and in communication.



## RESPONSIBLE


Camper is about people with local values and global horizons. Wherever we are, we will do the right thing for people and the environment.

 CODE OF CONDUCT




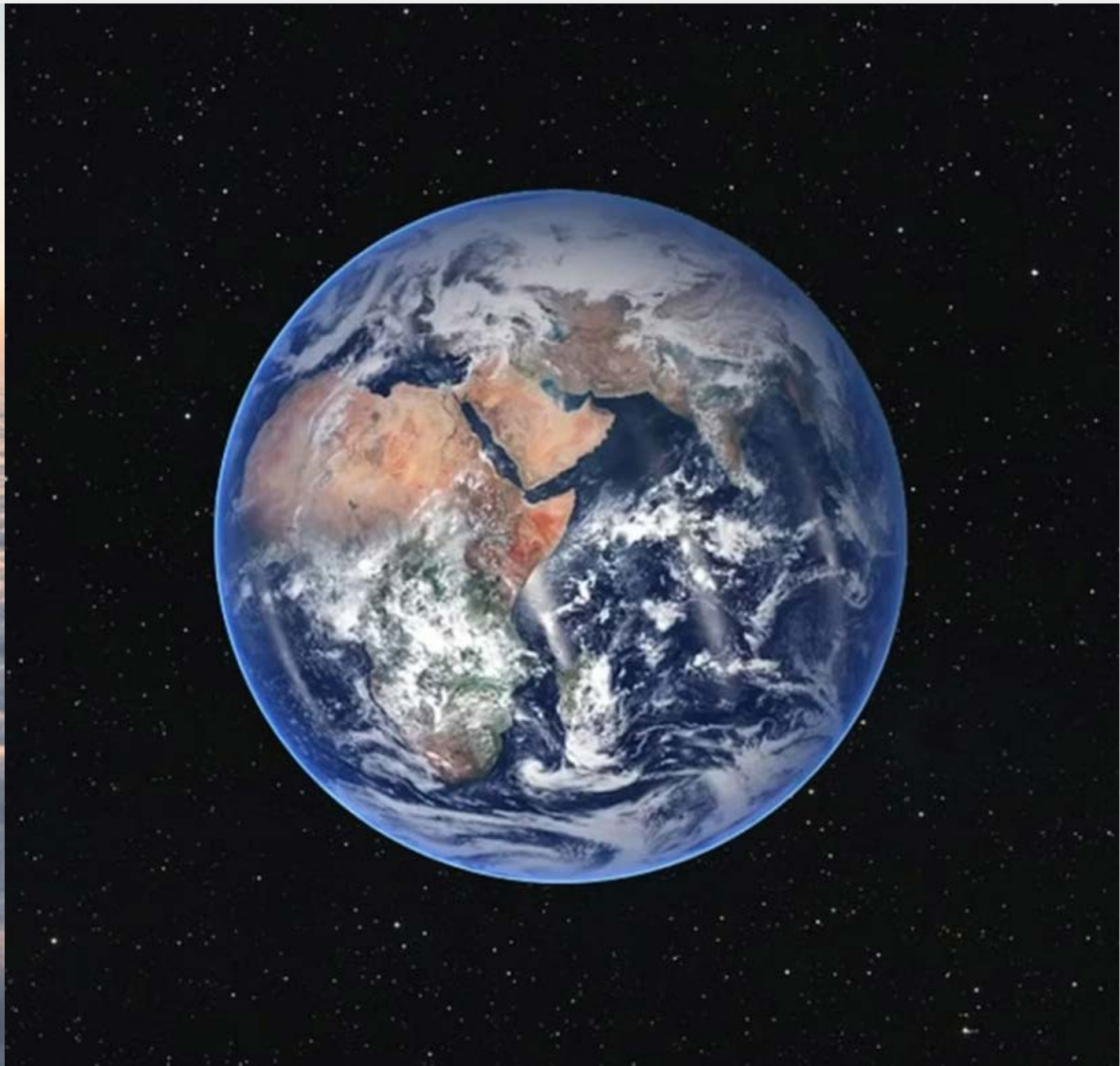
A LITTLE BETTER, NEVER PERFECT

5





Inspiring **pzeoplz** to enjoy and respect **naturez**.

			
<div><p><b>Authenticity</b></p><p>We are fierce Outdoor sports practitioners and deeply passionate about nature and its community.</p></div>	<div><p><b>Usefulness</b></p><p>We make functional Outdoor equipment to be used in multiple activities and made to last. Our products should be repairable, reusable, repurposed or recyclable.</p></div>	<div><p><b>No-Normal</b></p><p>We want to explore new ways to do things. On product, on sustainability, on business social responsibility, on brand language — that become the norm tomorrow.</p></div>	<div><p><b>Commitment</b></p><p>We believe companies have to play an important role in social responsibility.</p></div>



# Our Commitments

Complimentary to our strategic objectives, to support our mission, are our ESG Commitments. These support our values and aim to ensure we support profit, people and the planet:

- Designing Unique Walking Experiences
- Delivering Responsible and Ethical Growth
- Preserving and Conserve Natural Resources
- Caring About Human Progress

Thinking in this way, enables us to create a business of value for all our stakeholders. Here we explain our Code based on how we interact with different areas: For the planet, towards society, with our partners, with our people and for our wider stakeholders.

## Creating Lasting Value

Our objective is to create value through profits, people, and planet. This approach means that we need a culture of rigorous decision-making and continuous improvement. So that we can track the decision-making process we have an Organisational Management System to ensure the business is well-managed through the different areas and that the strategic objectives are achieved effectively and efficiently, with adequate risk management.

We need to always consider the following in our day-to-day processes:

- Following and applying our robust corporate governance system.
- Complying with local laws and our own policies.
- Managing data and information responsibly.
- Competing fairly.
- Accounting and reporting with integrity.
- Zero tolerance of actual or attempted fraud.
- Prohibiting money laundering or tax evasion.

## Corruption and Bribery

A bribe is considered to be anything of value given to influence someone’s behaviour in order to obtain a financial or commercial advantage. We must not pay bribes to anyone, anywhere, for any reason or equally accept anything of value that might affect our objectivity in doing our job. We must also, never falsify, omit, misstate, alter or conceal any information, or otherwise misrepresent the facts on a company record or encourage or allow anyone else to do so.

Each of us is responsible for understanding how to identify and avoid all forms of corruption, as outlined in the *Anti-Bribery and Corruption Policy*.

## Money Laundering

Money laundering is the process by which people try to make the sources of their illegal funds look legitimate. We must all look out for illegal customer or supplier financial transactions for the purposes of money laundering.

## Irresponsible sharing of business Information

We are responsible for all business records in our daily work. Business records include any information or communication in paper or electronic form that are maintained in the course of business, such as emails, project plans, purchase orders or contracts. This is property of the company (and will remain so even if we decide to leave the company).

## What we can do

- Track and record our decision making processes.
- Follow business processes rigorously.
- Look out for fraudulent activity, for example trying to use a stolen credit card or a supplier trying to launder money.
- Keep accurate records so that payments can be honestly described and recorded.
- Remember that email and voicemail systems and the content on them are considered the company's property. Never try to give, take or sell this information.
- Ensure the integrity of our value chain by communicating our policies to others who conduct business on our behalf.
- Identify and manage our risks.
- Use our resources in an efficient manner.

### RELEVANT DOCUMENTS

- Organisational Management System
- Risk Management Policy
- Data Protection Policy
- Compliance Policy
- Policy on the Prevention of Money Laundering
- Anti-Corruption and Bribery Policy



# Our Commitment to You

## A Great Place to Work

With a history of more than 140 years as a family-owned company, we understand that our teams are our main asset. We are committed to providing the best possible environment so that we can develop our potential and achieve our goals. We encourage teamwork, empowerment, talent development and cross-departmental collaboration, a **culture of performance, accountability and continuous feedback**, based on our mission and values.

We want everyone to be treated and rewarded fairly, regularly discussing high performance and career development so that each person has a clear sense of purpose. That means a selection process, internal promotion, training, and compensation scheme that are all based on the criteria of competences, relevant skills and professional merit.

## Equality, Diversity and Inclusion

We are continually learning how to be the kind of company which enables self-expression, one that values the uniqueness of every individual. We are committed to promoting equal opportunities among all employees and will work to encourage and drive positive reinforcement with all its stakeholders.

We prohibit discrimination and **HARASSMENT** based on race, colour, gender, national origin, age, religion, functional diversity, sexual orientation, gender identity or expression, citizenship status, genetic information, marital status, pregnancy or family status or any other characteristic protected by applicable law.

This includes actions that are offensive, threatening or discriminatory, as well as any form of sexual harassment or bullying and applies to the behaviour of everyone.

Remember that **HARASSMENT**, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions. If you or someone else is the subject of discrimination or harassment, speak up and report it. You can read our **Anti-Harassment Policy** for more guidance.

## Health, Wellness and Safety

Taking care of the health, wellness and safety of others is everyone’s responsibility. No-one should be asked to endanger their health, wellness and safety as part of their work. We want to ensure that our colleagues, suppliers, and visitors are always in a safe and secure environment that is free of hazards. We are committed to provide sufficient resources, information and training to ensure a safe working environment and regularly evaluate our health and safety performance to ensure continuous improvement.

## Gifts and Other Conflicts of Interest

An occasional gift is often viewed as a normal part of doing business, but sometimes this can cause a conflict of interest and can be seen as a bribe.

Never accept or provide gifts or entertainment with the intention of influencing a decision or that are in exchange for business, services or confidential information. Any gift given or accepted must be modest in value, infrequent and have a reasonable business purpose.

There are other actions which can create **CONFLICTS OF INTEREST**. Having a conflict of interest is typically not breaking the Code of Conduct and Ethics but failing to disclose it is.

A **CONFLICT OF INTERESTS** is anything that interferes with your ability to make objective business decisions, especially personal relationships or investments.

### We should never:

- Let business decisions be influenced by our own personal interest.
- Use company property, information or resources for personal benefit
- Employ, supervise or have a direct or indirect line of reporting to a family member, romantic partner or close friend.
- Have other employment that negatively affects your performance.

### RELEVANT DOCUMENTS



- Ethical Marketing Policy
- Data Protection Policy
- Supplier Code of Conduct
- Procurement Policy
- Procurement Guidelines (available for different areas)



## Being a Brand Ambassador

We expect everyone to behave and represent the company in a respectful way, following this Code and our values.

For an interview or external speaking engagement, or to publish any video or written content, everyone must ask for prior approval from the Brand Department. Be mindful that posting on social media channels counts as external communication, so if you've identified yourself as an employee or have mentioned the brand, please follow the same principles and do not misrepresent or damage the brand knowingly or unintentionally.

If you are contacted and asked to discuss company business with members of the press, do not provide any information. Instead, put them in touch with Brand [press@camper.com](mailto:press@camper.com).

## What we can do

- Treat others as they want to be treated.
- Keep an open mind to new ideas and opinions and listen to different points of view, never allowing personal biases to influence your decision-making
- Base employment decisions on legitimate business requirements.
- Take a clear stand against offensive messages, comments and inappropriate jokes which conflict with our culture and undermine our team environment.
- Never tolerate intimidation, harassment or bullying of any kind.
- Always comply with relevant health and safety legislation and our own policy.
- Speak up if you see an unsafe condition or a potential danger to yourself or others.
- Help suppliers, temporary workers and others we work with to understand and follow our safety and security procedures.
- Be ready to work. Never be impaired by alcohol or drugs, including prescriptions and over-the-counter medications, whilst at work.
- Never disclose any financial or potentially competitive information, without prior approval of the Executive Committee.
- Don't act on behalf of the business where we are not authorised to do so, or outside of our area of expertise.
- Don't accept large gifts which could be considered bribes.
- If you feel you have a conflict of interest, report this to your manager or the legal department





# Building Strong Relationships

## Our Customer Comes First

Our customers are central to every decision we make. We put our customers at the heart of everything we do, using creativity and authenticity to inspire them. No matter what work we do, it affects and impacts our final consumer. We must always be customer-centric, delivering the highest standard of quality and communicating transparently and openly. Looking after our customer means we will:

- **Health & Safety:** work to ensure that we are living up to our rigorous quality standards to meet all government requirements and global standards. This means following the specific legal requirements of each country where we are operating or selling.
- **Ethical Marketing:** responsibly market our products and services accurately and transparently. This means truthfully, responsibly, and in adherence to all relevant laws and regulations in the countries where we operate.
- **Data Privacy:** respect privacy. We will always handle the personal information of customers, consumers, or others with whom we do business, with care, especially sensitive personal information. We comply with data privacy laws and policies everywhere we operate.

RELEVANT DOCUMENTS


Ethical Marketing Policy

Data Protection Policy

Supplier Code of Conduct

Procurement Policy

Procurement Guidelines (available for different areas)



## Together with Our Suppliers

Our suppliers and business partners make significant contributions to our success. Over the years, we have built up a small number of long-term, trusted suppliers who share our values. Our suppliers include any third-party vendor, consultant, contractor, service provider, or supplier of raw materials. When they became our partners, they agreed to support our vision to continual improvement, creating more efficient processes, better environmental practices and ensuring exemplary human rights standards.

We hold our suppliers to the same standards of integrity to which we hold ourselves, following *Procurement Guidelines* to help ensure we select the best possible partners. All significant suppliers must agree to our *Supplier Code of Conduct* as a condition of doing business with us. If a significant risk is identified in the supply chain, we will work to develop effective monitoring, remedial or contractual action.

What we can do

- Share our customers’ values and communicate with honesty and integrity.
- Never overstate or misrepresent the qualities of our products or services.
- Never make claims, including the ones about our products or product ingredients, without adequate substantiation.
- Help educate our customers about making sustainable choices.
- Collect, access and use personal information only for legitimate business purposes.
- Never leave confidential information exposed in unsecured or public places.
- Never discuss confidential information when others might overhear you (for example on planes, in public spaces etc...).
- Make sure any partners or suppliers who may handle data understand the importance we place on privacy, and they uphold our standards.
- Follow Procurement Guidelines to select partners on the best interests of the company, not for any personal benefit for you, a family member or a close friend.
- Watch for signs that suppliers and partners are breaking our Supplier Code of Conduct or laws and regulations.



# Our Pledge to Society

We have a great opportunity to contribute to the development of society through our daily business operations, creating value for ourselves and the wider community. This includes the social conditions of people who work or are connected with the company, and our impact within the wider community where we operate.

## Supporting Human Rights

Our people-related policies and supplier policies are designed to ensure that **every individual** is treated with dignity and respect. They are based on internationally recognised human rights principles including the UN Universal Declaration of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

We will not tolerate or condone any abuse of human rights within our operations, supply chains or business partners - this is supported by our *Suppliers Code of Conduct*. We are committed to this and report on our actions annually in our **MODERN SLAVERY Statement** detailing what we are doing to halt and prevent these abuses.

If we discover and verify a breach of Human Rights, we will take immediate action. For business relationships if prompt corrective action is not taken or adequate remedy provided, we will terminate our relationships.

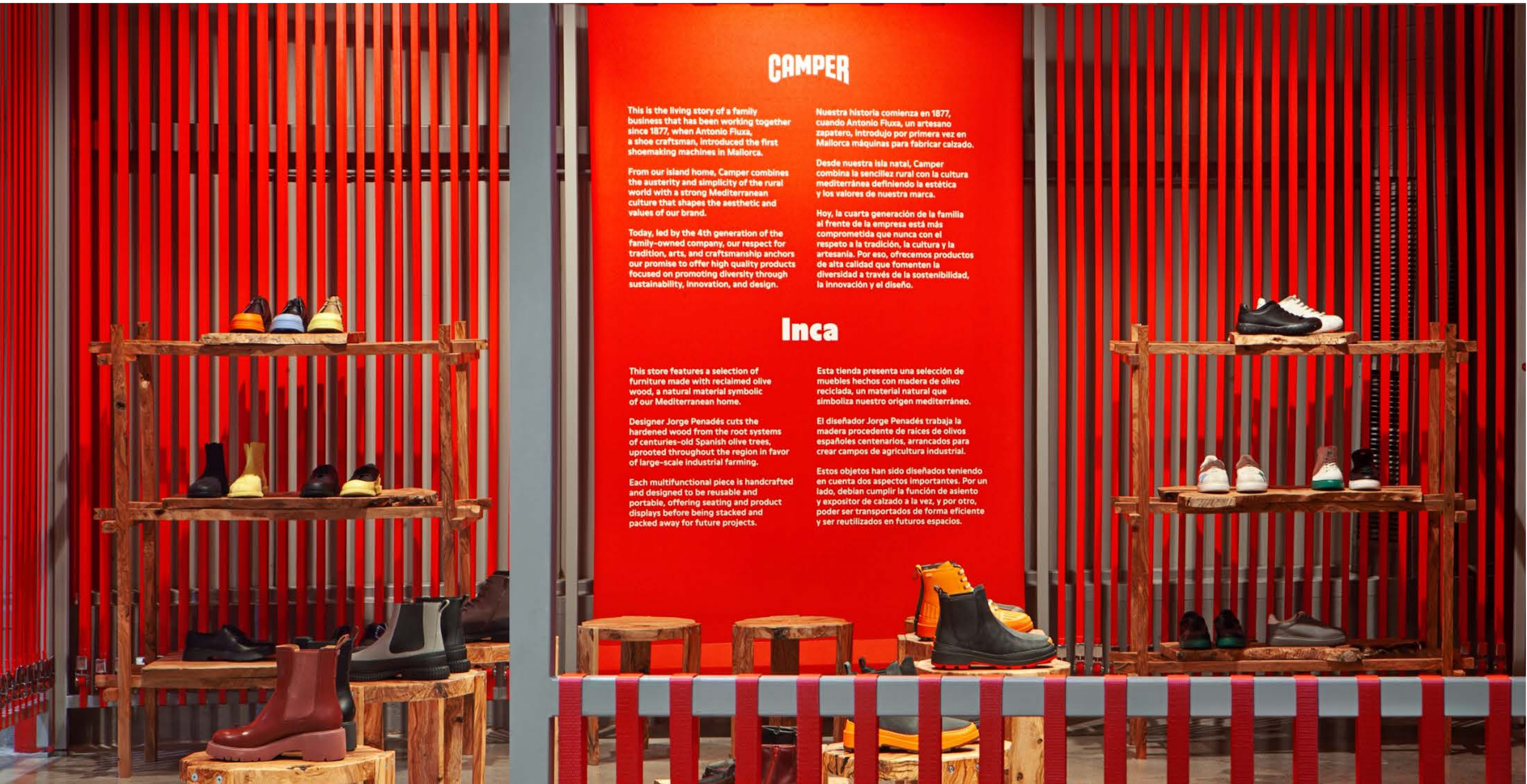
**MODERN SLAVERY** is defined as the recruitment, movement, harbouring or receiving of children, women, or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. We have a responsibility to prevent these issues from occurring in our operations and value chain, as set out in existing and evolving regulations.

## What we can do

- Ask for training if you feel you need more information on human rights for your day-to-day work.
- Raise any concerns if you feel that there are any human rights abuses occurring anywhere with or connected with our business.
- Encourage collaborations which stimulate good business or support local organisations.
- Support our NGO partners when we have company activities.

### RELEVANT DOCUMENTS

- ESG Policy
- Human Rights Policy
- People Policy
- Supplier Code of Conduct
- Modern Slavery Statement
- Donations and Sponsorship Policy
- Annual Sustainability Report





Supporting Change

We believe that collaboration is key to creating a responsible economy. We partner and collaborate with stakeholders who align with our values and can help create a sustainable future which benefits people and planet.

We are committed to making the sectors we work in more responsible and we recognise that this may require regulatory change at local and macro level. However, we are not actively involved in lobbying, and we are politically neutral with no party-political affiliations. We will always publicly list the organisations we are working with. We will never attempt to improperly influence any government official or policy maker to gain a business advantage. We do not make political donations.

We respect the right of team members to involve themselves in any political campaigning they wish on their own behalf but must never infer they are acting on behalf of the business.

Giving Back to Local Communities

Our social commitment prioritises care for human progress, where we support local communities and organisations related to our business with a focus on our home, Mallorca.

We place great importance on establishing long-term connections and collaborations with various local entities, going beyond solely financial contributions. We outline all the organisations we support transparently in our sustainability report. Our intention is to develop relationships that go beyond the mere contribution of a donation, developing special initiatives that lead to meaningful partnerships.

Our Promise to the Planet

We are committed to a **long-term sustainable approach** to develop products and services that have as little footprint as possible, operating as a responsible business with rigorous processes and practices.


We are committed to protecting the environment by working to minimise the impact of everything we do and at each stage of our business. This includes our responsibility towards the United Nations Sustainable Development Goals (SDGs) and their call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity by 2030.

This responsibility will always be a part of our DNA as we work to solve problems, create unique walking experiences and meet our ambitious sustainability goals.

### What we can do

- Reduce our carbon footprint.
- Meet or exceed all environmental laws and regulations.
- Minimise waste - don't print, select low-waste options, avoid single-use plastic.
- Conserve resources - energy, water and materials and improve energy efficiency.
- Use raw materials effectively - selecting regenerative, renewable, and recyclable options.
- Travel responsibly to reduce our carbon footprint.



RELEVANT DOCUMENTS	
ESG Policy	
Environment Policy	



# Being Accountable

## What is my personal responsibility?

Acting ethically and responsibly happens one decision at a time, every day, by each of us. Our Code, together with our company policies, gives you the information needed to perform your job ethically.

With international operations, we are committed to complying with the laws of the countries where we operate. Global laws and regulations are complex; following our Code and policies will help ensure your compliance with applicable local laws, as well as our own standards, missions and values.



### AS AN **EMPLOYEE** YOU NEED TO:

- Read and understand the Code of Conduct and Ethics.
- Ensure you uphold the Code with everyone you meet during your time at work.
- Treat others with respect.
- Immediately report issues that could conflict or breach the Code.
- Understand the consequences of not complying with the Code.
- Cooperate and be honest when responding to investigations or audits.

### AS A **MANAGER** YOU NEED TO:

- Ensure you and your team have read, fully understand and uphold the Code of Conduct and Ethics.
- Lead by example and ask for further training if you need it.
- Listen and respond to concerns when they are raised.
- Pay particular attention to the policies that relate to your role and responsibilities.
- Understand the steps you must take if the Code is not being followed, and report concerns which might be inconsistent with this Code.
- Make sure that no one who speaks up suffers retaliation.
- Never ask or pressure anyone to do something that you are not permitted to do yourself.
- If you supervise third parties, make sure they understand our Code and their obligations.

### What we can do

- Respect and follow our *Code of Conduct & Ethics*
- Always do what is right
- Empower others to live by our values
- Be accountable for your own actions



# Making the Right Choice

Making the right choice isn't easy. As a rule, you may find it helpful to ask yourself the following questions:

- Is it legal, correct and fair?
- Is it ethical?
- Is it in line with the Code of Conduct and Ethics, mission and values?
- Do I understand the risks and can I foresee the consequences of my actions?
- Am I making an informed decision?
- Have I asked for approval?
- Do my actions support the objectives and reputation of the company?
- Are my actions appropriate towards those I work and interact with?

If the answer to any of these questions is “no” or you have doubts, do not proceed and seek advice (see the Reporting Concerns section for further information).

# What should I do if I’m asked to perform a task that I believe might go against our Code of Conduct?

You should **never knowingly violate our Code**, a policy or a law, even if a manager directs you to do so or because you failed to ask for guidance.

We will not make any kind of disciplinary action against a person for a mistake or unintentional action based on their training, knowledge, and experience. However, intentional violations, destructive actions, and gross negligence will not be tolerated. Serious misconduct can result in disciplinary measures including dismissal and possible civil and criminal proceedings.

We also remind everyone that any suggestion, report or concern submitted in good faith will never be ignored, and **no punishment or retaliation** will occur as a result of raising your hand.

# How do I speak up?

## Reporting Concerns and Whistleblowing

We understand it can be hard to speak up about possible misconduct. It may be easier to look the other way, but misconduct affects us all. There are two ways you can raise concerns: through your manager or through the Whistleblower Channel.

**Raising concerns through your manager** is appropriate for issues related to job-specific policies and processes, work responsibilities, co-worker issues, discipline disputes, promotion opportunities, health and safety, and working environment.

On the other hand, the **Whistleblower Channel** is an externally hosted service that guarantees confidentiality and is available to any stakeholder - within or outside of the company. This channel is suitable for more serious concerns such as breaches of the company's internal Code of Conduct and Ethics or the one for suppliers, accounting or auditing irregularities, corruption, Human Rights violations, illegal discrimination and harassment, for example.

Each inquiry submitted to the Whistleblower Channel will receive a tracking number for follow-up or additional information. Access it through this link <https://report.whistleb.com/en/camper> which is also available on the intranet.

*No matter how misconduct is reported or what it involves, we will not tolerate retaliation against anyone who makes a report with good intentions.*



# Let's Review

We encourage you to refer to the Code often and ask you to raise a question if you want more information on any topic, you can contact [esg@camper.com](mailto:esg@camper.com).

We ask that every employee of the Camper Group read and understand the Code of Conduct and Ethics - especially new employees during their onboarding period.

Any modification, change or addition to the Code will be duly communicated to all employees through the internal communication tools.

We want to ensure that everyone receives training on Code of Conduct and Ethics on an annual basis. Should you wish to ask for training on this topic, please contact: [esg@camper.com](mailto:esg@camper.com).

Below you will find a list of useful links to support this Code:



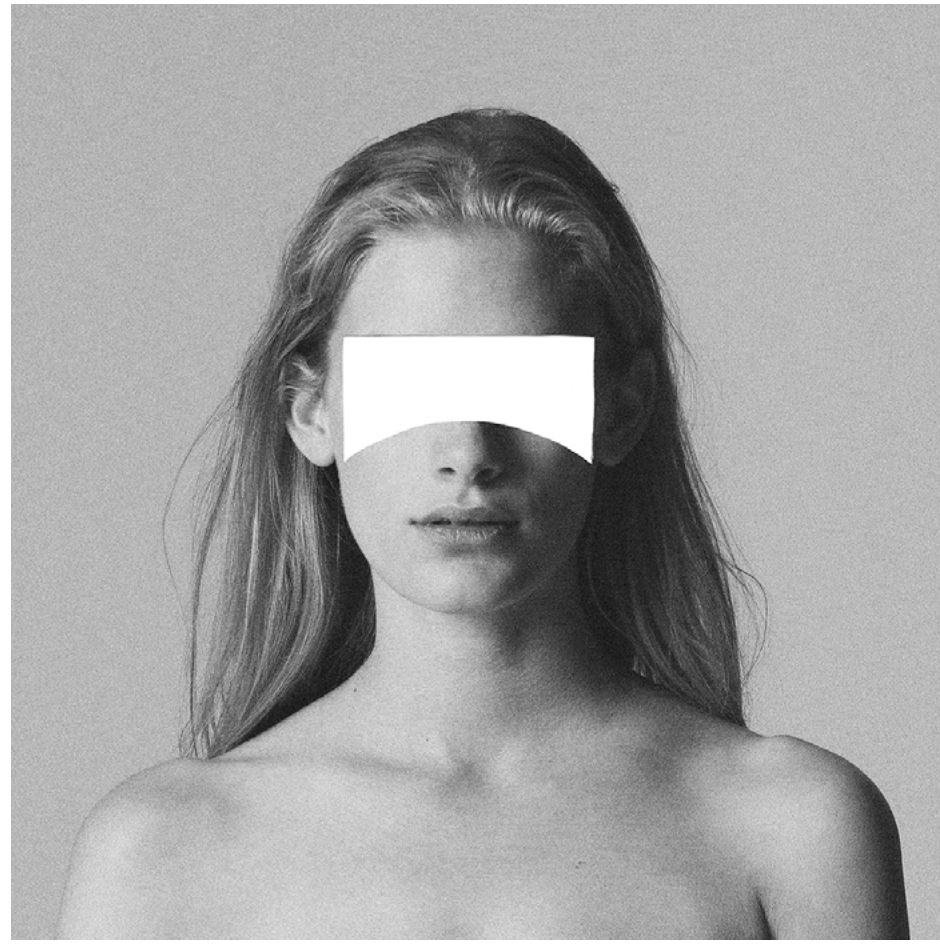
**ANNUAL SUSTAINABILITY REPORT**

The annual communication of environmental, social, and governance (ESG) goals—as well as a company's progress towards them.



**ANTI-CORRUPTION AND BRIBERY POLICY**

To ensure we all comply with anti-corruption laws and practices worldwide, in particular the laws that prohibit any type of bribery.



**ANTI-HARASSMENT POLICY**

To outline and prevent antagonistic situations that violate the dignity of employees.



**COMPLIANCE POLICY**

Prevents the company against criminal liability.



**CONFLICTS OF INTEREST POLICY**

To outline procedures for employees when a possible conflict exists between their own personal interests and the interests of the organisation.



**DATA PROTECTION POLICY**

Details about how customer data, employee personal information, intellectual property and other sensitive information is to be handled.



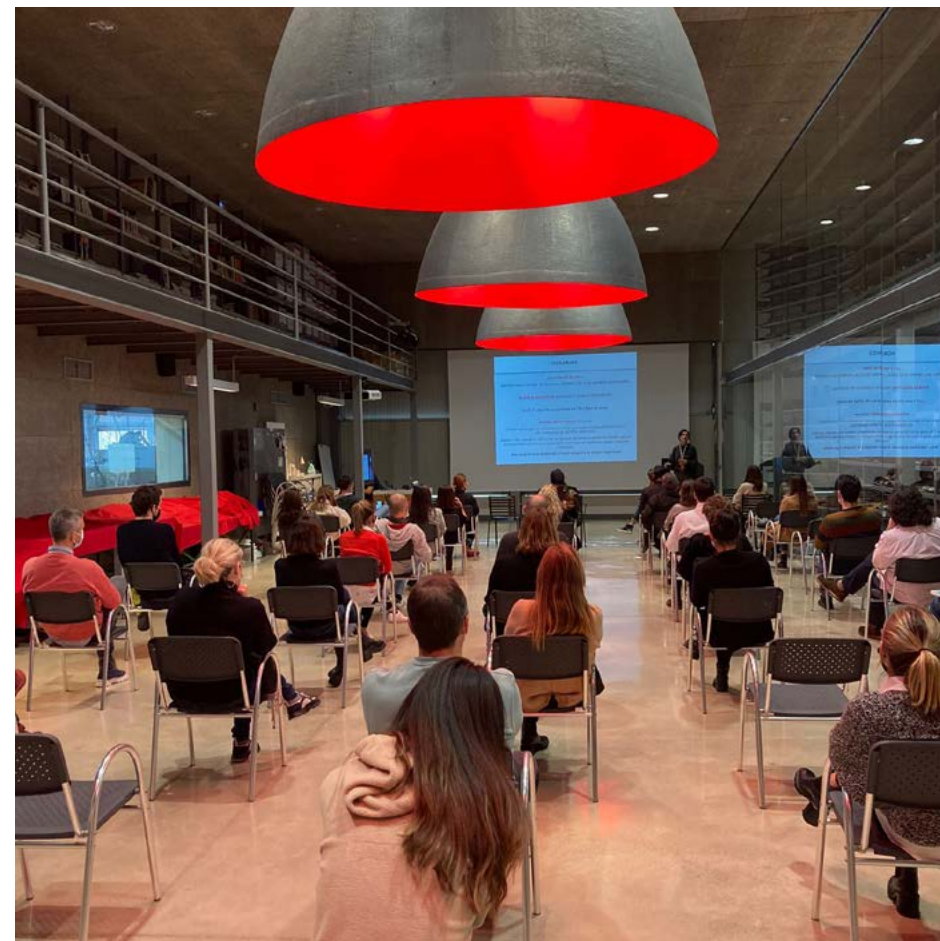
**DONATIONS AND SPONSORSHIP POLICY**

Outlines how philanthropic donations and sponsorships should be developed.



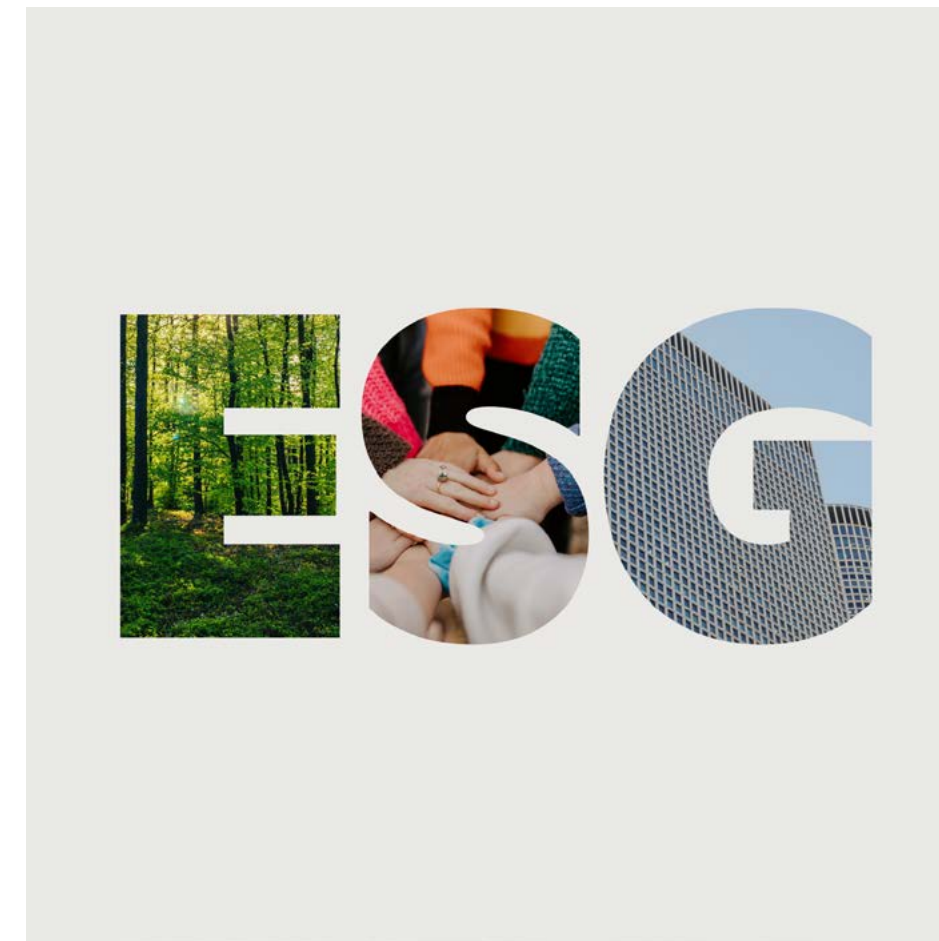
**ENVIRONMENT POLICY**

Explains the organisation's commitment to reduce its impact on the environment, and provides a framework for setting objectives.



**EQUALITY, DIVERSITY AND INCLUSION POLICY**

To commit to the inclusion and respect of every individual in the workplace.



**ESG POLICY**

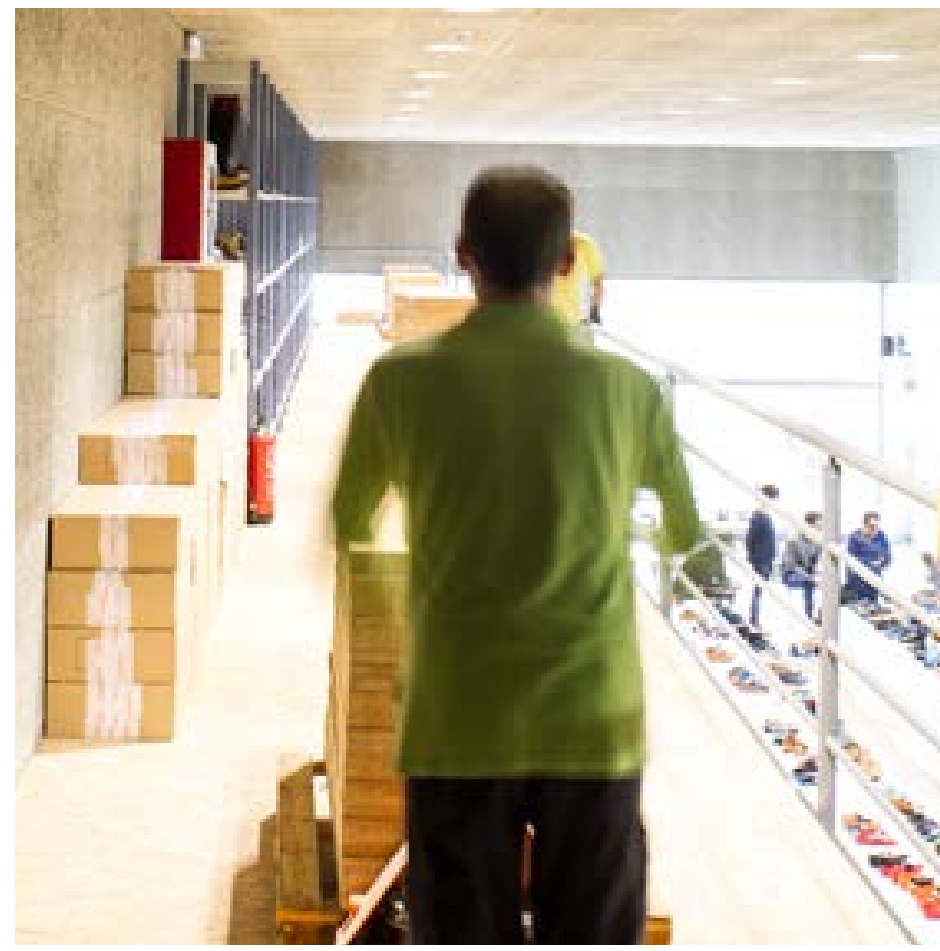
A set of standards measuring a business's impact on society, the environment, and how transparent and accountable it is.





**ETHICAL MARKETING POLICY**

A commitment towards open, transparent, responsible, and fair practices and to communicate these values, never over-selling.



**OCCUPATIONAL RISK PREVENTION POLICY**

Details the protection of the health and safety of employees and to the public.



**HUMAN RIGHTS POLICY**

Sets out how the company respects human rights by identifying, preventing, and mitigating inappropriate actions.



**MODERN SLAVERY STATEMENT**

Explains the commitment of the company towards eliminating the different types of modern slavery.



**POLICY ON THE PREVENTION OF MONEY LAUNDERING**

Exists to help institutions combat money laundering by stopping criminals from engaging in transactions.



**ORGANISATIONAL MANAGEMENT SYSTEM**

How the organization manages the interrelated parts of its business with rigour and process to achieve its mission.



**PEOPLE POLICY**

Outlines the requirements of our global processes related to people and organisation,



**PROCUREMENT GUIDELINES**  
(available for different suppliers)

The preparation and processing of suppliers against certain criteria in order to make an accurate selection.



**PROCUREMENT POLICY**

To ensure the best value, quality, and performance of a supplier by outlining the principles required by the procurer



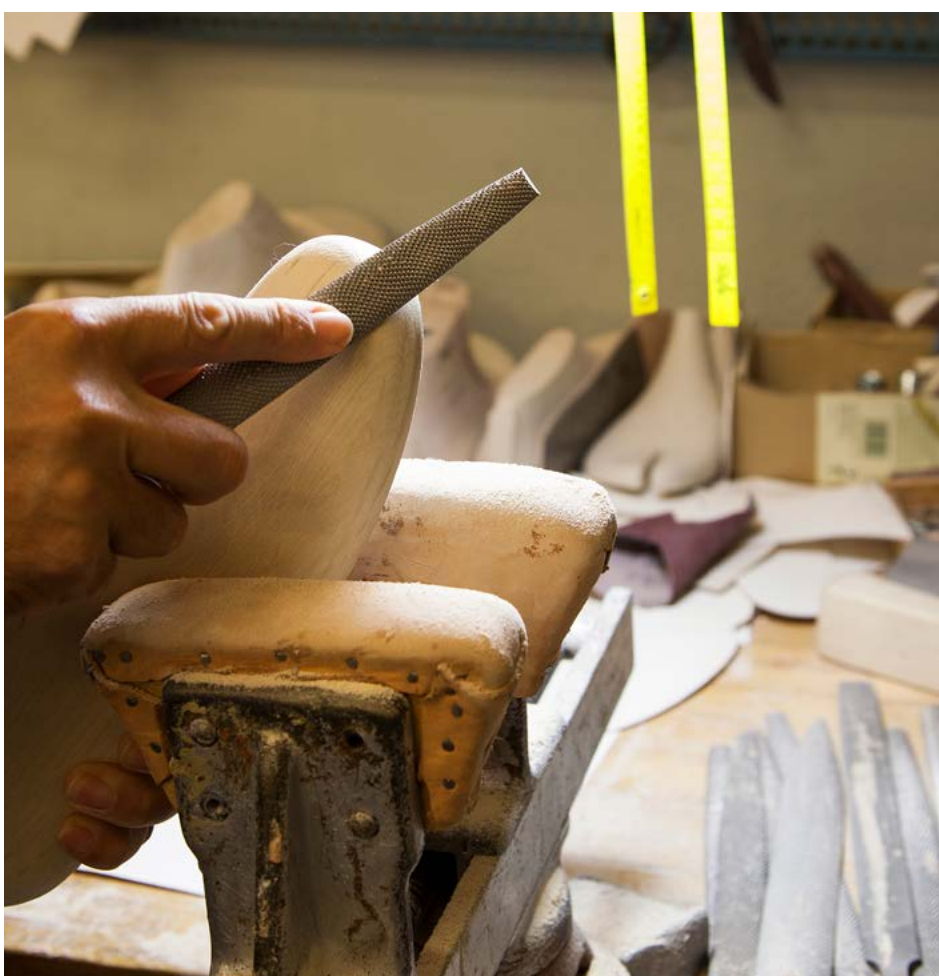
**SUPPLIER CODE OF CONDUCT**

Created for the purpose of ensuring that a company's suppliers adhere to high ESG standards.



**WORKERS HEALTH PROMOTION POLICY**

Seeks to continually improve working conditions to protect and enhance the health of workers.



**RISK MANAGEMENT POLICY**

To establish the framework of action of risk tolerance limits, controls, analysis and assessment of possible risks and opportunities.



