

# **CODE OF CONDUCT & ETHICS**

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## INDEX

1. Mission
2. CAMPER Values
3. Message from CEO – Miquel Fluxà
  - Why a Code of Conduct & Ethics?
4. What is the Code of Conduct & Ethics?
5. How is the Code of Conduct & Ethics applied?
6. Who does the Code of Conduct & Ethics apply to?
7. Context
8. General Commitments
  - 8.1 Commitments for employed personnel
  - 8.2 Commitments for Clients, Customers & Providers
  - 8.3 Commitments towards Society, Environment, Public Administration and Media
9. Instruction and communication of the Code of Conduct and Ethics
10. Sustainable Development Goals
11. Whistleblower Channel

## **CODE OF CONDUCT AND ETHICS**

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### **1. Mission**

#### **WALKING WITH PURPOSE**

Delighting people with a playful, sustainable and responsible walking experience.

### **2. CAMPER Values**

#### **Real**

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

#### **Imaginative**

Camper thinks differently. And we want to be seen to be different. But not in a loud, showy way. We will add a twist of understated imagination to everything we do – in product, retail and communication.

#### **Playful**

Camper is from the Mediterranean. We are serious about what we do but do not take ourselves too seriously. We walk, we don't run. And we will always try to add a smile to life.

#### **Caring**

Camper is about people with local values and global horizons. We will do the right thing for the people and the environment wherever we work.

### **3. Message from CEO – Miquel Fluxà – Why a Code of Conduct & Ethics?**

We are a business with more than 140 years of experience in footwear manufacture and design. Throughout our history we have been innovators - growing our business to create what we have today.

Over the years, our values and our principles have acted as building blocks to drive sustainable success or support us during more challenging times. Our desire for constant improvement requires solid foundations and a strong guiding code so that we can face the future with confidence. This Code reinforces our approach with all stakeholders and what it means to be Camper.

### **4. What is the Code of Conduct & Ethics?**

The Camper Code of Conduct and Ethics (hereinafter the "Code") is the document that establishes the basic principles of behavior of the Company with respect to its stakeholders: employees, administrators, management team, middle managers and other employees, suppliers, providers, clients, customers, public administration, partners and other collaborators.

## 5. How is the Code of Conduct & Ethics applied?

In line with our Camper Mission and Vision, the Company is firmly engaged to developing a culture of total commitment acting responsibly, taking into account the social and environmental concerns of all its stakeholders (employees, clients, shareholders, suppliers and Public Administrations), ensuring long-term sustainable behaviour, based on principles of business ethics, and transparency in all its spheres of action. As a result, we establish ourselves as a socially responsible company committed to quality, best business practices, respect for human rights and the planet.

At Camper, **ethical conduct and behaviours are inseparable from rigour, integrity and good judgment in the decision-making process**, through a risk analysis. Ethical behaviour goes beyond strict compliance with the law and therefore we at Camper have a responsibility to comply, not only with the letter of the law, but also with its spirit, basing our decisions on applicable legislation, internal regulations and commitment to our values.

Camper operates in various countries around the world with different business models, and the complexity of local laws and regulations may require additional, more specific guidance than that provided by this Code. In this case, whenever there is a difference between local requirements and this Code, we must apply the most restrictive norm between both and not follow what customs dictate or apply practices that would violate the Code or go against our values or the company's reputation.

## 6. Who does the Code of Conduct & Ethics apply to?

All **Camper employees without exception** are responsible for complying with these standards, as an essential element of our business model and company culture.

The Code affects all those who work at or for Camper, regardless of their function, location or hierarchical level. We also ask that sub-contractors, consultants and anyone working on behalf of the company follow and apply the code.

Additionally, we consider that any partner, manufacturer or suppliers must also work, following the standards and behaviours. This is detailed in the **Code of Conduct for Suppliers**.

Staff members who do not align with the Code may face disciplinary measures, including dismissal. Additionally, this is subject to possible civil and criminal proceedings against the employee.

Camper will not take any kind of disciplinary action against employees for their actions, mistakes, or decisions as long as they fall within what may be expected of them on the exercise of their ordinary work tasks, based on their training, knowledge, and experience. However, intentional violations, destructive actions, and gross negligence will not be tolerated.

## 7. Context

It is impossible to foresee all the situations that may arise in the development of our activity. For this reason, the objective of the Code of Conduct and Ethics is to provide minimum guidelines for conduct and behaviour that guide our decisions at a professional and personal level.

If you are concerned about the decisions you have to make in a given situation, it may help to ask yourself:

- Is it legal, correct and fair?
- Is it ethical?
- Is it in line with the Code of Conduct and Ethics?
- Do I understand the risks, and can I foresee the consequences?
- Am I making an informed decision?
- Have I submitted the matter for internal consultation and approval?
- Are my actions aimed at improving the company or the collective project?
- Am I sure I receive no personal benefit from the decisions I am taking?
- Will it reflect well on the Camper Brand and Values?

If the answer to any of these questions is “no” or you have doubts, do not proceed.

There are several ways to seek further advice or help, the main ones being:

- 1) Go to your immediate superior, the Executive Committee or the Legal department.
- 2) Send an e-mail to the following address [ethicscompliancechannel@camper.com](mailto:ethicscompliancechannel@camper.com), in accordance with our Whistleblower Channel Policy.
- 3) For any confidential query use our [Whistleblower](https://report.whistleb.com/en/camper) tool <https://report.whistleb.com/en/camper>.

## 8. General Commitments

- Continuously comply with all legal and regulatory requirements, national and international, applicable to the business activities and jurisdictions carried out.
- The development of a business strategy that prioritizes the generation of a positive impact for Camper shareholders, people, society and the environment in a sustained manner over time, through a system of measurement, control of objectives and risk assessment.
- Regularly identify, assess and manage with due diligence the risks that affect not only its business, but also those of its stakeholders. Prevent the Company from those risks considered out the limits of its risk-bearing capacity in accordance with its [Risk Management Policy](#).
- The application of corporate financial reporting practices and policies that allow the faithful image of the company's financial situation to be reflected with complete accuracy, rigor, reliability, integrity and transparency.

- Camper rejects any form of corruption and in doing so applies a zero-tolerance criterion with respect to any breach of the [Anti-Corruption and Bribery Policy](#).
- Commitment for strict and rigorous compliance with legislation on the prevention of money laundering and the financing of terrorism as detailed in the [Policy on the Prevention of Money Laundering](#).
- All information important for business operations must be protected against loss, violation, misuse and disclosure.

### **8.1. Commitments for Camper employed personnel**

Ensure that the internal regulations and the actions of the management team, middle managers and other employees are based on ethical criteria, social and environmental performance aligned with Camper's principles and values.

- Without exception, Camper neither allows nor consents to the participation by its executives and employees in any act of corruption or bribery in the exercise of their professional activity, not even when it is believed that they are acting for the benefit of Camper. This is in accordance with its [Anti-Corruption and Bribery Policy](#)
- Camper staff must avoid situations that might conflict with their private interests and the interests of Camper.
- During their employment and afterwards, staff must keep all non-public, proprietary information secret. The information may only be used to promote Camper business interests.
- Ensure that selection processes, internal promotion, training and compensation are based on criteria of competence, worth, skills and professional merit.
- The establishment of human resources policies that ensure equal opportunities, diversity and inclusion and the development of a culture, a style of leadership and management that guarantees compliance with the objectives set by the company and this Code of Conduct.
- To provide safe, decent, and stimulating working conditions. Undesirable behaviour including sexual or other intimidation, bullying, violence, and discrimination for any reason are not tolerated.
- Ensure equal opportunities and non-discrimination due to race, colour, sexual orientation, marital status, family responsibilities, age, religion or creed, gender, disability or hierarchy, among others in accordance to our [Equality, Diversity and Inclusion Policy](#)
- Camper provides a [Whistleblower Channel](#) that ensures the possibility to inform, in a confidential way, about a concern on any issue that is not in line with our values and Code of Conduct and Ethics, and that may seriously affect our organisation or a person's life or health.

### **8.2. Commitments for Clients, Customers and Providers**

- To design and manufacture products of the highest quality and excellence, thanks to the use of the best materials.

- Ensure that our production process is subject to exhaustive quality controls that guarantee the quality of our products and comply with the specific legal requirements of each country where we sell our product .
- To guarantee a service of the highest quality and to adapt to the needs of the client.
- To work in order to create a solid long-term relationship based on outstanding customer service.
- The hiring of suppliers that meet adequate standards of corporate social responsibility in the way they carry out their business activities, including their environmental and social behaviours, and compliance with ethical principles. This is detailed in the [Code of Conduct for Suppliers](#).

### **8.3. Commitments towards Society, Environment, Public Administration and Media**

- To safeguard the environment through the implementation of responsible business practices that minimize its environmental footprint. This is detailed in the [ESG Policy](#).
- The commitment to social responsibility and the protection of human rights in all its activities.
- To protect the personal information provided by any stakeholder and to guarantee its integrity, availability, security and confidentiality. The company respects the privacy of its customers, staff, business relations, and other relevant persons, and protects their personal data against abuse.
- To not use references in our internal or external communications that are discriminatory or include expressions of prejudice. Please refer to our [Marketing Ethical Policy](#)

## **9. Instruction and communication of the Code of Conduct and Ethics**

Camper undertakes to deliver this Code of Conduct and Ethics to any new employee in any company of the group.

Camper will make the Code of Conduct and Ethics available to all employees through the company's intranet page (<https://sites.google.com/camper.com/camper-intranet/>).

Any modification, change or addition to the Code will be duly communicated to all employees through the internal communication tools provided for this purpose, such as email and the company's intranet page without prejudice to using any other internal means of communication. that it deems appropriate.

The company also establishes the obligation that all employees receive adequate and timely training through the appropriate means to verify the good understanding and acceptance of the Code of Conduct and Ethics.

Camper will provide specific updated training on the Code of Conduct with, at least, an annual periodicity.

## 10. Sustainable Development Goals

The Sustainable Development Goals (SDGs), also known as the Global Goals, were adopted by all United Nations Member States in 2015 as a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity by 2030.

**Camper** aligns with the [SDGs](#) whereby the Company commits to align its strategies and operations through a set of principles related to human rights, labour standards, environmental protection and fraud prevention and corruption aimed at guaranteeing the ethical and socially responsible behaviour of the entire company in the development of its operations.

Below, outlines the groups SDG's that fit most closely with its strategy and core business processes. They include:



Camper continuously works to improve the levels of productivity and profitability of its business model through innovation locally and globally through partners.



With a legacy for creating well-made and durable footwear, Camper's mission sets out its philosophy towards reducing its environmental impact by reducing resources, selection of materials and by the development of innovative production and design techniques



Camper contributes to the global reduction of carbon emissions as a strategic priority, through a holistic approach to measuring, reducing and offsetting the footprint of its direct and indirect actions.



With its roots in the Mediterranean, Camper collaborates with local entities



Through the selection of more responsible materials, from improved agricultural processes



Camper believes that the only way to multiply the positive impact and achieve the



focused on the conservation and protection of the Mediterranean Sea, as well as an aim to eliminate virgin plastics through the use of recycled plastics or natural alternatives.

and including good animal welfare, the company contributes to the conservation and sustainable use of natural terrestrial ecosystems.

achievement of the goals of the SDGs is through the collaboration and partnerships for the implementation of projects and improvements in its ESG objectives.

In addition, we are also developing projects which contribute to the following goals:



More information and guidance can be found within the [ESG Policy](#).

## 11. Whistleblower Channel

Violations and suspicion of possible violations of this Code or any other Camper Internal regulations must be reported immediately by means of the Whistleblower Channel.

For these purposes, Camper makes available to all stakeholders a reporting channel tool managed by a third party, available at <https://report.whistleb.com/en/camper>, which guarantees the confidentiality of the report, unless the employee expressly and voluntarily provides the contact information and authorizes its use, or that is essential to continue with the reporting process.

The [Whistleblower Channel](#), available at Camper Intranet, describes the procedure that staff must follow to report misconduct, or suspicion thereof and the way the report is treated. The **Whistleblower Policy** also describes the guarantees regarding confidentiality and the protection that staff have.

Camper does not allow any kind of reprisals against staff members who have reported a violation, or possible violation, in good faith, and guarantees to keep confidentiality and prevents any disciplinary action against the staff who have reported such violation.

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