

CODE OF CONDUCT FOR TRANSA BUSINESS PARTNER 1.0

Raus. Aber richtig.



PREAMBLE

Transa Backpacking AG (hereinafter also referred to as "Transa", "we", "us", "our") is convinced that all companies have a responsibility towards the environment and society. The outdoor industry depends on an intact nature as well as on people who use their skills to produce high-quality products. All people, animals and the natural environment that are part of our value chain should be treated lawfully and in a morally as well as ethically respectful manner. It is up to us and to our business partners to ensure this. This Code of Conduct sets out the binding obligations that our business partners must observe throughout the supply chain.

We expect all our business partners (hereinafter referred to as "business partners", "you" or "your") to comply with the minimum standards set out in this Code of Conduct in the areas of human and employee rights as well as environmental and animal protection (cf. "required practice"). We also encourage our business partners to take a leading role in the aforementioned areas through their own measures (cf. "encouraged practice").

Our business partners ensure that all companies in their supply chain are aware of their social and legal obligations and manufacture and supply their products to Transa in accordance with this Code of Conduct.

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1 BASIC UNDERSTANDING AND VALIDITY

We require our business partners to comply with or go beyond the obligations set out in this Code of Conduct and the nationally and internationally recognized norms and standards listed below. Our business partners are also required to ensure that these norms and standards are also adhered to by all companies in their supply chain. The norms and standards are as follows:

human and labor rights:

- the UN Guiding Principles on Business and Human Rights.
- ILO Declaration on Fundamental Principles and Rights at Work (namely C 87, C 98, C 29, C 105, C 138, C 182, C 100, C 111) and the ILO-IOE Child Labour Guidance Tool for Business.
- the OECD Due Diligence Guidance for Promoting Responsible Supply Chains in the Apparel and Footwear Industry.

Environmental protection:

- the EU Chemicals Regulation REACH (EC 1907/2006) as well as the Swiss Chemicals Regulation and the Chemicals Risk Reduction Regulation, which have been largely harmonized with the European REACH and CLP Regulations (ChemO and ORRChem, respectively).
- the EU Timber Trade Regulation (EU No. 995/2010).

Animal welfare:

- the EU Directives on the protection of animals kept for farming purposes, during transport and related operations, and at the time of killing (98/58/EC, EC 1/2005 and EC 1099/2009 respectively).
- The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

We are committed to always working towards improvements in all core areas of our business activities and encourage our business partners to do the same. We give preference to business partners whose standards go beyond "required practice" and who have a highly transparent value chain and certified audit systems.

This Code of Conduct applies to all business activities between the Business Partner and Transa. As a business partner, you therefore acknowledge and accept that:

- Your contractual partner is Transa Backpacking AG, Josefstrasse 53, 8005 Zurich, Switzerland.
- you, as a business partner, are obligated to comply with this Code of Conduct even if you do business with companies that are affiliated with us.
- This Code of Conduct applies to all of our orders placed with you, regardless of the category of goods and/or brand of products.
- This Code of Conduct applies to the entire period during which you supply products to us, regardless of the legal basis (written, oral agreement, etc.) of the cooperation between you and us.

2 HUMAN RIGHTS AND LABOR STANDARDS

2.1 REQUIRED PRACTICE

All business partners respect human dignity and comply with the above rules and standards regarding internationally recognized human rights and labor standards.

2.1.1 EMPLOYMENT RELATIONSHIP

All business partners reject any form of unlawful punishment, abuse, harassment, intimidation or other undignified treatment of employees and comply with applicable labor law in all employment relationships and require the same of their contractors and subcontractors. At the beginning of the employment relationship, employees will receive understandable and written information about all material aspects of their employment relationship with the business partner, including their rights and obligations, working hours, and compensation and payment arrangements.

"Zero-hour contracts" or internship contracts may only be shot down if there is a serious intention to teach skills or enter into a regular employment relationship. Young employees must be given the opportunity to participate in training programs. Such contracts may not be concluded in order to avoid obligations to employees arising from labor or social security laws.

All business partners respect and protect the right of employees to terminate their employment relationship in compliance with applicable notice periods.

2.1.2 REGULAR EMPLOYMENT

All employees of the business partner are entitled to a written employment contract in their national language, in which the working conditions are specified. The Business Partner shall ensure that all employees are aware of their legal rights and obligations under the employment relationship. The rights of employees shall not be circumvented by the excessive use of temporary contracts, subcontracts or training programs.

2.1.3 BAN ON FORCED LABOR

Business partners are prohibited from engaging in any form of forced labor. No worker may be forced to work by force, threat of force or intimidation (see ILO Conventions [C 29](#), [C 105](#) above).

2.1.4 PROHIBITION OF CHILD LABOR AND PROTECTION OF YOUNG WORKERS

No child labor may be used. The employment of workers of school age is prohibited, and in any case workers must be at least 15 years old.

We expect our business partners to use appropriate means to monitor the age of young workers in order to prevent child labor. If child labor is identified, all necessary measures must be taken immediately to ensure the welfare, protection and development of the child and to terminate the employment relationship.

In the case of employees under the age of 18, the rights of young employees must be observed. Young workers may only be employed if it is ensured that the employment relationship does not pose a risk to their health, safety or morals and that it does not harm their development (see above ILO Conventions [C 138](#), [C 182](#)).

2.1.5 NO DISCRIMINATION

All business partners shall ensure that no employee is discriminated against on the basis of gender, skin color, religion, age, disability, sexual orientation, nationality, political opinion, social or ethnic origin. Specifically, discrimination is prohibited in hiring, during employment, salary, benefits, promotions, termination or retirement. Foreign and migrant workers must be treated equally with national workers (see ILO Conventions [C 100](#), [C 111](#)).

2.1.6 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

All business partners recognize and respect the right of workers to freely join or not join organizations and unions of their choice, and to bargain collectively. Where freedom of association or collective bargaining is restricted under local law, business partners shall provide alternative means by which bargaining opportunities for workers can be created. We do not accept disciplinary or discriminatory actions by business partners against workers who seek to organize or join a union peacefully and lawfully. Worker representatives must not be discriminated against and must have access to all workplaces they need to perform their representative duties (see ILO Conventions [C 87](#), [C 98](#); above).

2.1.7 WAGES AND BENEFITS

Wages and benefits provided must meet the minimum standards set by law or by the industry and must always be sufficient to meet the basic needs of employees and their families and to have additional financial resources at their free disposal. Workers must be adequately and clearly informed about their wages, especially with regard to wage levels and payment dates.

All business partners shall comply with the statutory or - where applicable - collectively agreed provisions concerning the remuneration of work services. The business partners shall ensure that the wages paid are not lower than the minimum wage required by law or agreed in collective bargaining. All benefits provided for by law, in particular insurance, vacation and vacation days, shall be granted. In countries or regions where there are no statutory or collectively agreed wage requirements, business partners shall pay particular attention to ensuring that the wages paid for regular full-time employment are sufficient to cover the basic needs of employees. Legally impermissible wage deductions, in particular wage deductions as a disciplinary measure, will not be tolerated.

All business partners must fully compensate their employees for all hours worked. Wages must be paid regularly and on time. The amount of wages must be adjusted to the experience, qualifications and work commitment of the employees. In addition to remuneration for regular working hours, employees must be paid overtime at least at the legally prescribed rate. In countries where there are no such laws, workers' wages for overtime must be higher than the local average wages for corresponding activities. Employees are entitled to days off in accordance with applicable laws, local customs and norms, such as in case of illness or accident, vacations, parental leave, national holidays, etc.

2.1.8 WORKING HOURS

Business partners shall not require employees to work more than 60 hours (48 hours plus a maximum of 12 hours of overtime) per week or to exceed the statutory maximum working hours, whichever is lower, unless exceptional circumstances would require exceeding them. Employees shall always be granted a rest period of at least twenty-four (24) consecutive hours within a seven-day period. The Business Partner shall allow its workers free time for meals and breaks. He shall keep payroll and attendance records of documented payment of wages and hours worked for each worker.

2.1.9 HEALTH AND SAFETY

All business partners must comply with national and international regulations concerning health and safety in the workplace and ensure a safe working environment. Business partners shall ensure safety concepts that prevent accidents and damage to health in the workplace. This includes safe buildings, fire protection, electrical safety, the safe handling of hazardous substances and the correct use of personal protective equipment. Lighting, hygiene concepts, heating and ventilation systems must be adequate. Workers must always have access to clean sanitary facilities and drinking water. The workplace must have safety and health concepts that are clearly communicated to all workers.

The regulations concerning health and safety also apply to living facilities for employees, including dormitories and canteens, if they are provided by the business partner.

2.1.10 PROTECTION FROM HARASSMENT

All business partners must treat their employees with respect and dignity. Workers must have a workplace that is free from physical, sexual, psychological or verbal harassment or abuse.

2.2 ENCOURAGED PRACTICE

We encourage our business partners to commit to social standards that go beyond those defined as "required practice" and ensure comprehensive transparency along their value chain. Business partners are encouraged to have their social standards audited and certified by external parties.

2.2.1 MULTI-STAKEHOLDER INITIATIVES

We encourage our business partners to actively work for better working conditions and to work towards the payment of living wages through multi-stakeholder initiatives. We consider the following initiatives or those that go beyond them to be high-quality multi-stakeholder initiatives in the areas of human and labor rights:

- the Fair Wear Foundation (FWF).
- the Fair Labor Association (FLA).

2.2.2 WORK EQUIPMENT CERTIFICATIONS

We encourage our business partners to work in certified facilities. The business partner should demonstrate that it is doing everything possible to correct any deficiencies in working facilities within a reasonable timeframe. High quality certification systems for facilities are considered to be the SA8000 standard of Social Accountability International (SAI) or standards that are at least equivalent or higher.

3 ENVIRONMENT

3.1 REQUIRED PRACTICE

3.1.1 PROTECTION OF THE ENVIRONMENT AND CLIMATE

All business partners must fulfill their responsibility to the environment by complying with applicable legal requirements and recognized standards for the protection of the environment and climate, and by striving to continuously reduce the impact of their business activities on the environment and climate.

We require all our business partners to take appropriate measures based on legally and internationally recognized standards covering the following topics:

- Professional and responsible handling of hazardous materials and other chemicals and waste, including their disposal.
- Efforts to reduce or eliminate waste and minimize emissions from operations (e.g., wastewater, exhaust air, noise, greenhouse gases).
- Conservation of natural resources, e.g. by means of measures to save water, chemicals and other raw materials.
- Promote the use of certified recycling and other climate and environmental technologies, processes, raw materials and products.
- Efforts to increase energy efficiency and the share of green or renewable energy in energy consumption at company sites.

3.1.2 IMPLEMENTATION OF THE EU CHEMICALS DIRECTIVE REACH AS WELL AS MRSL AND RSL

We encourage all of our business partners to understand and implement their obligations under the [EU Chemicals Regulation REACH \(EC 1907/2006\)](#) and the corresponding Swiss regulations, which have been largely harmonized with the European Chemicals Regulation ([ChemV](#) and [ORRChem](#); see above). To implement REACH, business partners must prepare a Manufacturing Restricted Substances Lists (MRSL) and a Restricted Substances Lists (RSL) in the final product that meet all local regulatory requirements of both the country of production and the country of sale. Business partners must make these lists available upon request. The same obligations apply to all suppliers of the business partners and all subcontractors.

By signing this Code of Conduct, business partners confirm that they have pre-registered or registered all substances contained in products supplied to us that must be registered in accordance with the REACH Directive. The business partners undertake to inform us without being asked about substances of very high concern in our products if they exceed the threshold concentration for substances of very high concern according to REACH (see REACH Art. 33).

3.2 ENCOURAGED PRACTICE

We encourage our business partners to commit to environmental protection that goes beyond the standards set as "required practice" and to ensure comprehensive transparency along their value chain. Business partners are encouraged to have their chemical management system audited and certified by external parties as evidence of an up-to-date chemical management system and continuous process optimization. Manufacturing Restricted Substances Lists (MRSLs) and Restricted Substances Lists (RSLs) in the final product should comply with a credible third-party standard such as GreenScreen for Safer Chemicals.

We consider the following systems or systems that go beyond them to be high-quality testing systems in the field of environmental protection:

- the bluesign system.
- Zero Discharge of Hazardous Chemicals (ZDHC).
- We recommend tanneries and other business partners with leather supply chains to adopt the Leather Working Group (LWG) Manufacturing Standard and be certified at the "Gold" level.

4 ANIMAL WELFARE

4.1 REQUIRED PRACTICE

We ask our business partners to observe the principles of animal welfare and the protection of biodiversity and to align their business activities accordingly. The keeping, transport and use of animals must comply with applicable legal animal welfare regulations and meet the requirements of the relevant EU directives ([98/58/EC](#); [EC 1/2005](#); [EC 1099/2009](#); see above) or equivalent standards and be species-appropriate. Our business partners shall act in accordance with the Five Freedoms (developed by the UK Farm Animal Welfare Council), which affirms the right of every living creature to be treated with consideration.

In addition, all business partners must comply with the Convention on International Trade in Endangered Species of Wild Fauna and Flora ([CITES](#); see above).

4.1.1 FUR

We do not accept real fur in our products and prohibit the use of fur in products supplied to us by our business partners. The use of faux fur is permitted and must be labeled accordingly.

4.1.2 LEATHER

Use only leather that is a by-product of the food industry.

4.1.3 FEATHERS AND DOWN

The use of feathers and down from ducks, geese and chickens is only permitted if they are by-products of the food industry. We reject live plucking and feeding by means of stomach tubes and prohibit their use in all products supplied to us by our business partners.

4.1.4 WOOL

Wool is allowed only if it comes from live and domesticated animals, including sheep, goats, alpacas, llamas, camels, cows, buffalo, yaks, horses and pigs. Hair and wool must not come from animals that have been kept or sheared in a manner that harms the animals. We oppose the practice of mulesing and therefore prohibit the use of mulesed wool in products supplied to us, as well as wool from farms where mulesing is practiced.

4.2 ENCOURAGED PRACTICE

We encourage our business partners to commit to animal welfare standards that go beyond those set as "required practice" and to ensure full transparency along their value chain. Business partners are encouraged to have their animal welfare standards audited and certified by external parties.

We consider the following certification systems or systems that go beyond them to be high-quality certification systems in the field of animal welfare:

4.2.1 FEATHERS AND DOWN

- the Traceable Down Standard (TDS).
- the Responsible Down Standard (RDS).

4.2.2 WOOL

- the Responsible Wool Standard (RWS).
- the ZQ or ZQ^{RX} Merino standard.

5 OTHER REQUIRED PRACTICES

5.1 TROPICAL WOOD AND ENDANGERED SPECIES

We require all our business partners to comply with all national and international regulations when using wood, in particular the Convention on International Trade in Endangered Species of Wild Fauna and Flora ([CITES](#); see above) and the EU Timber Trade Regulation ([EUTR](#); see above). These rules also apply to packaging, tags, labels, etc. Business partners must obtain a valid Forest Stewardship Council (FSC) certificate for all imports of timber species listed in [CITES](#) Appendix III. The use of tropical wood is only permitted if the wood is certified according to the FSC standard.

5.2 MONEY LAUNDERING, CORRUPTION AND BRIBERY

We require all our business partners to comply with their legal obligations to prevent money laundering and not to engage in money laundering activities. We expect all our business partners to behave honestly and sincerely towards us and towards third parties, such as contractual partners or authorities, and to comply with international anti-corruption standards and national anti-corruption and anti-money laundering laws. This also applies to any transactions that appear to be for the purpose of granting improper advantages.

6 OTHER ENCOURAGED PRACTICES

6.1 PRODUCT CERTIFICATES

We call on our business partners to continuously strive for better environmental and animal protection as well as high social standards along their value chain and to ensure comprehensive transparency. Business partners are encouraged to have their products audited and certified by external parties.

We consider the following certification systems or those that go beyond them to be high-quality certification systems at the product level:

- Global Organic Textile Standard (GOTS).
- Oeko-Tex Made in Green.
- Fairtrade textile standard.

6.2 CERTIFIED RECYCLED MATERIALS

We demand products with high environmental performance and a low environmental footprint. Product claims about the use of recycled materials must always be certified by a standard. We consider the Global Recycling Standard (GRS) or standards that go beyond it to be a high-quality standard at the product level.

7 RIGHT TO UNBIASED INFORMATION AND TRANSPARENCY

We require unbiased information on social and environmental impacts and performance from products and business partners involved in the production of these products in our shared value chain. We reserve the right to verify compliance with this Code of Conduct and, if necessary, to request additional information from our business partners in our shared value chain. Our right to verify compliance with this Code of Conduct includes the right to conduct inspections of business partners or to have inspections conducted by external auditing firms.

8 RIGHT OF CANCELLATION

The business partner is obliged to inform Transa in writing if it becomes aware of any actual or potential violation of this Code of Conduct or any violation of other standards or laws in the areas of labor, animal or environmental protection. In the event of reasonable suspicion or a violation of this Code of Conduct, Transa has the right to cancel orders with the Business Partner and/or terminate the business relationship.

We, as Transa business partner, acknowledge receipt of the Code of Conduct and agree to its contents.

Company name / stamp: _____

Signature

Name, surname, title

Place, date

Signature