

**ACCOUNT OF
DUE DILIGENCE**
ACCORDING TO THE
**NORWEGIAN
TRANSPARENCY ACT
YEAR 2025**

1 GENERAL STATEMENT

As a conscientious and responsible global company, the HUGO BOSS Group ("HUGO BOSS") carries out extensive due diligence measures to protect human rights in its own business areas and in the supply chains.

HUGO BOSS with all its subsidiaries aims to comply with all respective due diligence acts worldwide including the Norwegian Transparency Act. Therefore, HUGO BOSS has set up a central governance system to structure and ensure compliance with all relevant due diligence acts at Group level.

HUGO BOSS Scandinavia AB ("HUGO BOSS Scandinavia") publishes this report in accordance with section 5 of the Transparency Act and describes our work on due diligence in our own business areas and supply chains. Our due diligence analysis, as described in this statement, reflects the entire Group due diligence work, as the internal guidelines and supply chain risks are the same across all our companies. However, only HUGO BOSS Scandinavia, through its NUF in Norway, HUGO BOSS SCANDINAVIA NUF ("HUGO BOSS Norway"), is directly subject to the Transparency Act for the part of our activity that applies to the Norwegian branch.

The disclosure covers the previous fiscal year, which ended on December 31, 2025.

This disclosure also covers employment-related risks with an impact on people, which we have included in the term "human rights".

2 OUR ORGANISATIONAL STRUCTURE

HUGO BOSS is a leading company in the premium fashion segment of the apparel market. Headquartered in Metzingen (Germany), the Company employs around 17,500 employees generating annual sales of about EUR 4.2 billion in the financial year 2025. HUGO BOSS is made up of 59 consolidated subsidiaries located in Europe, the Americas, and Asia/Pacific that bear responsibility for their local business activities. This includes 39 subsidiaries that are organized as distribution companies as well as four production companies.

HUGO BOSS operates its own stores and outlets in Norway through the company HUGO BOSS Norway.

2.1 OUR AREA OF OPERATIONS

The textile supply chain is typically defined by complex processes, which largely take place outside the confines of the Company. HUGO BOSS works together with a stable network of experienced and specialized suppliers in order to guarantee processing quality and optimum availability of its products. HUGO BOSS is in active supply relationships with several types of suppliers. These include contract manufacturing and merchandise, fabric and trimmings suppliers and other suppliers, that relate to the textile supply chain.

HUGO BOSS obtains a large proportion of its procurement volume from independent partners in regions that are in some cases economically underdeveloped. In some of these regions, there is also an

increased risk that political and social protection mechanisms for employees and their environment are lacking.

HUGO BOSS Norway receives finished goods delivered directly from other companies in the group chain, and does not enter into separate agreements with suppliers. The risk outlook for HUGO BOSS Norway is therefore the same as for HUGO BOSS Scandinavia and the Group's supply chain in general. The risk analysis carried out by the Group is thus directly transferable to the Norwegian operations.

2.2 OUR COMMITMENT TO HUMAN RIGHTS

For HUGO BOSS, respecting human rights means to treat everyone with respect and dignity; Equal treatment is paramount. We want people across our whole value chain to live a free and self-determined life without fearing restrictions or oppressions. HUGO BOSS is therefore committed to respecting and protecting human rights and recognizes international human rights and labor rights standards, including:

- The United Nations Universal Declaration of Human Rights (UDHR)
- The United Nations Guiding Principles on Business and Human Rights (UNGPR)
- The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- The Core Conventions of the International Labor Organization (ILO)
- The United Nations Convention on the Rights of the Child (CRC)
- The United Nations Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)

HUGO BOSS also expects all its partners to comply with and implement these standards.

2.3 OUR GUIDELINES & PROCEDURES REGARDING HUMAN RIGHTS

Being compliant with local laws, recognized social standards and the ILO core conventions is essential for respecting human rights of our own employees and those of our partners. The following HUGO BOSS codes and guidelines set the baseline to interact with our employees and define decent working conditions:

- [HUGO BOSS Code of Conduct](#);
- [HUGO BOSS Supplier Code of Conduct](#);
- [HUGO BOSS Statement Human Rights](#);
- [HUGO BOSS Human Rights Policy](#);
- [HUGO BOSS Child Labor Policy](#);
- [HUGO BOSS Whistleblowing Policy](#).

HUGO BOSS reserves the right to regularly review these documents (at least once annually) with the involvement of relevant interest groups, and to adapt them as needed.

Cooperation with our partners is based on respect for and compliance with business ethics, human rights, and decent working conditions and social standards. These are anchored in the Supplier Code of Conduct and are part of our contractual agreements.

Respect for human rights in global supply chains is a continuous and gradual process and requires a long-term commitment. We aim to achieve jointly with our partners continuous improvement in the field of human rights.

3 OUR DUE DILIGENCE PROCEDURE

The identification of human rights adverse impacts and risks within our own business areas (including HUGO BOSS Scandinavia and HUGO BOSS Norway) and supply chains is for HUGO BOSS the foundation to build an effective and appropriate risk management on. HUGO BOSS aims to prevent human rights risks, minimize them or end violations as far as possible by deriving preventive measures and remedial actions from the risk analysis.

The human rights risk analysis assesses human rights-related impacts on those potentially affected by the HUGO BOSS business activities (e.g., our own employees, employees of partners). The risk classification of our own business areas and partners is based on three pillars. HUGO BOSS uses recognized indices for the risk analysis of (1) countries of origin and (2) industries and sends out (3) self-assessments in order to derive further partner-specific risks.

3.1 INFORMATION ABOUT IMPACTS ON HUMAN RIGHTS

HUGO BOSS, including HUGO BOSS Norway has not disclosed any actual negative impact or material risk of negative impacts on human rights or decent working conditions in our own business areas or supply chain.

In general, HUGO BOSS assumes a constant significant risk in the areas of child labor, forced labor, working hours and remuneration due to well-known industry risks. Accordingly, these risks are permanently prioritized as part of the analysis, regardless of the annual results.

HUGO BOSS established our social compliance management and audit system almost 20 years ago and this system verifies the priority potential risk areas identified through the risk analysis carried out under the Transparency Act.

3.2 INFORMATION ABOUT PREVENTIVE MEASURES & REMEDIAL ACTIONS

Based on those systematic insights of the risk analysis HUGO BOSS develops specific measures to prevent and remedy human rights adverse impacts, risks or violations. We rely on a good mixture of various specific measures to address findings and continuously implement them in business processes of relevant departments.

In our direct sphere of influence at our partners, HUGO BOSS systematically focuses on identifying actual human rights adverse impacts and violations and consequently on minimizing or ending them jointly with our partners. Additionally, HUGO BOSS has established contractually binding standards for partners. Sharing knowledge to improve working conditions is key for us to prevent human rights risks. With this in mind, we require our partners to complete training courses that address human rights issues. Moreover, we are having topic-specific trainings for our suppliers. In addition, we have implemented

"ESG (Environmental-, Social- and Governance) Legal Live Sessions" for our suppliers to keep them informed about legal developments regarding ESG topics and their implications.

We believe that cooperation between companies, experts, political decision-makers and civil society organizations (usually in the context of multi-stakeholder initiatives) is the recipe for the development and implementation of integrative and sustainable solutions. Regular dialogue with relevant stakeholders is also a means for us to evaluate the effectiveness of our measures.

3.3 COMPLAINTS PROCEDURE AND REMEDIATION

HUGO BOSS takes all complaints from its own employees, employees of partners and other whistleblower groups seriously. HUGO BOSS consistently investigates all violations within a transparent and standardized process. Any verified violations of laws or standards set by HUGO BOSS will not be tolerated and will result in appropriate measures being taken.

The complaint channels are globally available free of charge, can be used anonymously and are available in many languages.

The **HUGO BOSS Speak Up Channel** offers confidential and anonymous communication with the HUGO BOSS Compliance Department. The channel is available in over 50 languages:



Furthermore, the independent **HUGO BOSS Ombudsperson** (person of trust) can be contacted at any time:

Dr. Carsten Thiel von Herff
Phone: + 800 66 28 37 6266
Mobile: + 49 151 58 230 321

E-mail: ombudsman@thielvonherff.com
Report platform Ombudsman: www.report-tvh.de/

We expect our partners to promote the HUGO BOSS whistleblowing channels and establish one of their own. This allows risks and violations to be identified and resolves conflicts quickly.

3.4 REPORTING

Transparent communication on human rights adverse impacts, risks and on our preventive measures and remedial actions is a core element of human rights due diligence for us. In our annual reports, we provide information on existing risks, measures taken, and general developments in our internal processes.

Due to the constantly changing political, social and economic conditions, we conduct our human rights risk analysis at least once a year and review the effectiveness of our preventive measures and remedial actions continuously. Also, this Account of Due Diligence, our internal monitoring processes and our communications are subject to an annual review, and we adjust them as necessary.

4 RESPONSIBILITIES

The overall responsibility for compliance with and implementation of the elements of this Account of Due Diligence lies with the Managing Board of the HUGO BOSS AG and the management of the HUGO BOSS Scandinavia and HUGO BOSS Norway. In order to continuously monitor human rights adverse impacts, risks and the associated risk management within the company, the position of Human Rights Officer has been established.

The Human Rights Officer informs the Managing Board regularly, and at least twice a year, about the human rights risks identified in the risk analysis and the risk management derived accordingly. Through his activities, he helps to identify, reduce and prevent risks.

Questions and suggestions can be addressed to Compliance@hugoboss.com at any time.

HUGO BOSS will make this report publicly available on the company's website (<https://group.hugoboss.com/en>) and will refer to it in the annual financial statements of the local company.



Daniel Grieder
HUGO BOSS AG
CEO

Date: June, 2026



Jörg Horcher
HUGO BOSS UK Limited
Managing Director

Date: June, 2026