



CODE OF CONDUCT

Ref. CoC 2025

solo upholds a strict Social, Environmental and Safety policy,

At **solo** we acknowledge our Social Responsibility, regardless of the location at which we conduct our business, whether this is in Europe, Asia or Anywhere else in the world, and we have therefore drawn up this present Code of Conduct in recognition of this fact.

It sets out the principles of business best practices that maintain a primary and constant focus on the need to observe Corporate Social Responsibility.

We Acknowledge that Corporate Social Responsibility is one of the fundamental, core principles of business practice.

The **solo** Code of Conduct has been drafted to ensure that our products are manufactured under conditions that reflect our values, in combination with National and International Laws and Regulations based on the Conventions of the International Labor Organization (ILO) and the Universal Declaration of Human Rights (UDHR) convention.

<https://www.un.org/en/universal-declaration-human-rights/>

At **solo** we firmly believe that all employees deserve to be treated with dignity and respect. This in each aspect of the employment relationship. Being directly employed by **solo** or by the factories we work with, their subcontractors and this throughout our supply chain.

By undersigning this, the undersigned Company, acknowledges to support us in our Corporate Social Responsibility plan and the principles it has been based upon.

Should it become apparent that the undersigning Company is in breach with these principles and when remediation does not work, **solo** will not hesitate to terminate the business relation. This can even lead to cancelling outstanding orders.

“Peace, dignity and equality on a healthy planet”



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Social Management Systems and Cascade Effect

Adopt and publicly communicate a written human rights policy statement, in line with the complexity and size of operations, approved at the most senior level.

Implement a process- and risk-based due diligence management system in their business practices in line with the UNGPs and adjusted to the business model of the company. The expectations set in this Code of Conduct should be embedded in the system.

Actively communicate their endorsement of the ILO conventions and the amfori BSCI Code of Conduct through all the functions in their company, as well as to their business partners and relevant stakeholders.

Train and incentivize all relevant departments and individuals in a manner that allows them to integrate the principles of responsible and gender-responsive business and purchasing practices in the company culture, and cascade it to their business partners.

Require their business partners to cascade the information to the relevant business partners and stakeholders in the supply chain, and follow-up with their business partners to work towards full observance of the ILO conventions and amfori BSCI Code of Conduct within the sphere of their influence, including intermediaries that are involved in the worker recruitment process, such as brokers, recruiters, and recruitment agencies.

Include all workers in their due diligence, especially the vulnerable parts in their supply chain such as homebased workers, smallholders, as well as temporary and migrant workers; identify the challenges at these levels, and partner with amfori and other relevant stakeholders for improvements.

Have the strategy, processes, and sufficient resources in place to meet the responsibilities related to the ILO conventions, amfori BSCI Code of Conduct and ensure that there is continuous improvement in its implementation,

Exercise responsible and gender-responsive purchasing practices and avoid putting their business partners in a position that prevents them from adhering to the ILO conventions and amfori BSCI Code of Conduct.

Employment is Freely Chosen and Prohibition of Forced Labor, modern slavery and human trafficking

We are committed to ensuring that all employment is freely chosen and that there is absolutely no tolerance for any form of forced labor, modern slavery and human trafficking. Our principles are grounded in international standards, including those set forth by the International Labor Organization (ILO) Conventions 29 and 105



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Voluntary Employment: Workers have the right to freely choose their employment without any form of coercion, deception, or compulsion. This includes the freedom to terminate employment after reasonable notice, as per local laws.

No Forced Labor: There shall be no use of forced labor, whether it be bonded labor, prison labor, or any other form of servitude. Workers will not be required to lodge deposits or surrender their identity papers to employers. Workers have access to comprehensive and accurate information and are supported in their right to terminate contracts, change employers, and safely return home if needed.

Responsible Recruitment Practices: Our commitment extends to responsible recruitment practices, ensuring that no recruitment fees are charged to workers, employment contracts are clear and transparent, and workers are free from coercion and deception during the recruitment process.

Dispute Resolution and Compensation: In the event of any violations of these principles, workers have access to free dispute resolution and effective remedies. Furthermore, we pledge to progressively compensate workers for any damages incurred within a reasonable timeframe.

The Rights of Freedom of Association and Collective Bargaining

Respect the right of workers to form and join trade unions – or to refrain from doing so – and bargain collectively, in a free and democratic way, without distinction whatsoever and irrespective of gender.

Ensure meaningful representation of all workers, without distinction whatsoever and irrespective of gender.

Not discriminate against workers because of trade union membership.

Not prevent workers' representatives and recruiters from having access to workers in the workplace or from interacting with them,

Respect this principle by allowing workers to freely elect their own representatives with whom the company can enter dialogue about workplace issues, when operating in countries where trade union activity is unlawful or where free and democratic trade union activity is not allowed.

Refers to ILO Conventions C087 - C098 - C135 - R143 - C154

Non-Discrimination in Employment

We are committed to creating an inclusive and equitable workplace environment where discrimination in any form is strictly prohibited.

Zero Tolerance for Discrimination: Discrimination in any form is not tolerated within our organization. This commitment extends to all aspects of the employment relationship, including recruitment, compensation, performance assessment, training access, promotion, and termination policies.



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Respect and Dignity: All workers are treated with respect and dignity, free from any form of violence, harassment, or degrading treatment. Our policies ensure that workers are not subjected to any form of violence, harassment, or intimidation, and disciplinary procedures are established to address any breaches in a fair and transparent manner.

Equal Opportunities: Our recruitment, wage policies, training programs, promotion policies, and all other aspects of the employment relationship are based on the principle of equal opportunities. We do not discriminate against individuals based on race, color, sex, gender, age, religion, political affiliation, union membership, nationality, social origin, disabilities, or any other characteristics that could lead to discrimination.

Alignment with International Standards: Our commitment aligns with international conventions, including ILO Conventions C100 and C111, which emphasize the elimination of discrimination in employment based on various grounds.

No Exploitation of Child Labor and Special Protection for Young Workers

We are committed to ensuring the protection of children and young workers from any form of exploitation and hazardous work practices.

Zero Tolerance for Child Labor: We unequivocally prohibit the use of child labor in any form. The minimum age for admission to employment is set at the age of completion of compulsory schooling, not less than 15 years, in compliance with ILO Conventions C138 and C182.

Protection from Exploitation: Children and young workers are safeguarded from forms of slavery, sale, and trafficking, as well as other practices like slavery, such as debt bondage and forced labor. Special attention is given to children aged 15-18 to ensure they are not engaged in work that may harm their health, safety, or morals.

Special Protection for Young Workers: Young workers are provided with special protection measures to safeguard their health, safety, morals, and development. This includes restrictions on night work, removal from hazardous work environments, and ensuring that their work is not detrimental to their health or development. Mechanisms are set up to prevent, identify, and mitigate harm to young workers, with a focus on access to grievance mechanisms and occupational health and safety training programs tailored to their needs.

Age-Verification Mechanisms and Protection Measures: Robust age-verification mechanisms are established as part of the recruitment process to prevent the employment of underage workers. Special care and proactive measures are taken in cases involving the dismissal or removal of children to ensure their protection and well-being.



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Fair Remuneration

We are committed to ensuring fair and equitable compensation and benefits for all workers, in compliance with legal requirements and industry standards.

Minimum Standards: Wages and benefits for a standard working week must meet at least legal or industry minimum standards. They should always be sufficient to meet the basic needs of workers and their families, providing a decent standard of living.

Fair Remuneration: Our commitment to fair remuneration includes compliance with government minimum wage legislation or industry standards established through collective bargaining. Wages should be paid in a regular, timely, and stable manner, fully in legal tender.

We recognize the importance of assessing the pay gap accurately and working progressively towards the payment of a living wage that affords a decent standard of living for workers and their families. Wages and benefits should not only meet minimum standards but also provide some discretionary income.

Equal Pay for Equal Work: Workers of all genders and categories, including migrant and local workers, should receive equal remuneration for equal jobs and qualifications. Pay differentials should reflect skills, responsibility, seniority, and education.

Deductions and Benefits: Deductions from wages should only be made in accordance with legal requirements or collective agreements. Workers should receive the social benefits legally granted to them without any negative impact on their pay, seniority, position, or promotion prospects.

Transparency: Workers must be adequately and clearly informed about their wages, including wage rates and pay periods, to ensure transparency and understanding.

Refers to ILO Conventions C131 – C095 – C026 – C012

Decent Working Hours

We are committed to ensuring that workers' hours of work are reasonable, in compliance with applicable laws, and conducive to a healthy work-life balance.

Maximum Working Hours: Workers shall not be required to work more than 48 standard hours per week, with at least one day off provided for every seven-day period. Overtime shall be kept to a minimum and shall not exceed 12 hours per week.

Voluntary Overtime: Overtime work shall be voluntary, with workers having the right to refuse overtime without facing repercussions. Overtime should only be used in exceptional circumstances and should not be demanded on a regular basis.



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Compensation for Overtime: Overtime work shall be compensated at a premium rate. This ensures that workers are adequately compensated for any additional hours worked.

Promotion of Work-Life Balance: We promote working hour practices that enable a healthy work-life balance for workers. This includes providing resting breaks during the working day and ensuring that workers have at least one day off in every seven days.

Alignment with International Standards: Our commitment interprets and aligns with applicable national legislation, industry benchmark standards or collective agreements within the international framework set out by the ILO and promotes working hour practices that enable a healthy work-life balance for the workers.

Legal Compliance: relevant legislation, including ILO Conventions C001 – C030 – C106 – C014

Safety, Health and Worker Protection Commitments

We are committed to ensuring safety, health, and protection for all workers through comprehensive measures and practices. This includes:

Safe and Hygienic Working Environment: We prioritize providing a safe and hygienic working environment, adhering to best occupational health and safety practices. Attention is given to industry-specific hazards, and effective regulations are implemented to prevent accidents and minimize health risks as much as possible.

Prevention of Abuse and Harassment: We strictly prohibit physical abuse, threats, unusual punishments, sexual harassment, and intimidation by the employer. Our aim is to foster a workplace culture where all workers feel respected and protected.

Training and Awareness: Regular training programs are conducted at all employment stages to educate workers about occupational health and safety risks. We provide information on potential hazards and promote awareness among workers and affected communities.

Worker Involvement and Protection: We actively involve workers and their representatives in decision-making processes regarding health, safety, and workplace conditions. Establish responsible management practices and long-term goals to protect workers, building competence among managers and workers to embed codes of conduct into our company culture.

Grievance Mechanisms: Establish effective operational-level grievance mechanisms to address concerns raised by workers and communities. These mechanisms are accessible and responsive, allowing for the timely resolution of issues and continuous improvement across our supply chain.

Legal Compliance: relevant legislation, including ILO Conventions C155 – C164 – C184



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Legally binding employment contract for all

Employers must ensure that their recruitment processes and employment relationships do not lead to insecurity or vulnerability for workers.

Employers should provide clear and understandable information in the workers' own language about their rights, responsibilities, and employment conditions, including working hours, remuneration, and terms of payment.

Employers must adhere to labor and social security laws and regulations.

Avoiding legal obligations through labor-only contracting arrangements or apprenticeships without genuine training intent is prohibited.

Younger workers should be given the opportunity to participate in education and training programs to enhance their skills and knowledge.

These principles align with various International Labor Organization (ILO) Conventions, including C095, C158, C175, C177, and C181, which aim to protect the rights of workers and promote fair and equitable employment practices.

Ethical Business behavior

Not take part in any act of corruption, extortion or embezzlement, nor in any form of bribery - including but not limited to - the promising, offering, giving or accepting of any improper monetary or other incentive,

Develop and adopt adequate internal controls, programs or measures for preventing and detecting corruption, extortion, embezzlement or any form of bribery, developed on the basis of a company-specific risk assessment,

Keep accurate information regarding their activities, structure and performance, and disclose these in accordance with applicable regulations and industry benchmark practices to enhance transparency of their activities,

Not falsify, or participate in falsifying any information or in any act of misrepresentation in the supply chain,

Provide awareness to the workers about the policies, controls, programs and measures against unethical behavior, and promote compliance within the company through trainings and communication,

Collect, use, and otherwise process personal information (including that from workers, business partners, customers and consumers in their sphere of influence) with reasonable care. The collection,



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use and other processing of personal information must comply with privacy and information security laws and regulatory requirements.

Environmental commitments

Comprehensive Waste Management: **solo** implements a rigorous procedure for waste management, encompassing storage, handling, and disposal of chemicals. It utilizes an Effluent Treatment Plant (ETP) meeting or exceeding legal minimum capacity, prioritizing biodegradable solutions.

Transparent Management System: Partnering with **solo** requires producing a comprehensive procedure manual showcasing the Management System, ensuring adherence to social accountability, environmental standards, and human health criteria. An anti-corruption policy is established and followed throughout all business activities.

Supply Chain Responsibility: **solo** holds partnering companies, including subcontractors, accountable for implementing and improving environmental practices throughout the supply chain. Subcontracting is only allowed with prior written approval, and all parties must comply with SOLO Group's Code of Conduct.

Environmental Due Diligence: **solo** implements a process- and risk-based environmental due diligence management system, tailored to its business model and integrated into the overall due diligence management process.

solo expects all their business partners to observe our Code of Conduct. Furthermore, any business partners that are monitored against the principles above are to show evidence that they take (a) all necessary measures to ensure their own observance of the Code of Conduct and reasonable measures to ensure that all of their business partners involved in the production process(es) observe the Code of Conduct.

Legal Compliance: **solo** commits to strict compliance with national environmental legislation and international standards, particularly in regions with weak or poorly enforced laws.

Proactive Impact Mitigation: The company proactively identifies and mitigates environmental impacts associated with its operations, implementing measures to prevent, mitigate, and remediate adverse effects on surrounding communities, natural resources, climate, and the overall environment



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CEO



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