

Triumph International's Code of Conduct

Based on the

“Corporate Image of TRIUMPH INTERNATIONAL”

and the “Charter of the European Social Partners of the Textile- and Clothing Sectors”

the Management of TRIUMPH INTERNATIONAL

and the European Works Council of TRIUMPH INTERNATIONAL

agree to the following

Code of Conduct

Introduction

TRIUMPH INTERNATIONAL has been active in Germany for 115 years and internationally for over 50 years. So, over several generations, a continuous contribution has been afforded to the prosperity of employees as well as a considerable spur to economic development in some disadvantaged regions.

TRIUMPH INTERNATIONAL is aware of the responsibilities that arise from its international business activities and the employment of a labour force world-wide. TRIUMPH INTERNATIONAL acknowledges that these responsibilities extend to all employees who produce TRIUMPH INTERNATIONAL products regardless of whether they are employees of TRIUMPH INTERNATIONAL or not.

Both parties emphasise the paramount importance of the protection of human rights laid down in the “General Declaration of Human Rights”. The parties are governed by the relevant agreement from the ILO and Global Compact of the United Nations for the regulation and furtherance of working and economic relations.

The parties declare themselves in favour of open and fair world trade, because in this respect they see the best prerequisites for a profitable and lasting development of the company and consequently for more secure jobs.

TRIUMPH INTERNATIONAL commits itself to follow the minimum standards and recommendations listed below;

1. Working Voluntarily – Illegal Forced Labour

Employment within TRIUMPH INTERNATIONAL companies is exclusively on the basis of a voluntary agreement. Any kind of forced labour, carried out in servitude/bondage or through imprisonment is prohibited (ILO-Agreement 29 and 105)

2. Union- and Freedom of Wage Negotiations

Every employee has the right to establish and join unions and the right for wage negotiations is acknowledged. (ILO-Agreement 87 and 98).

Employee - representatives must not be discriminated against and must have access to all necessary work places so that they are able to look after their representation function. (ILO-Agreement 135 and Recommendation 143).

3. Actual exclusion of child labour

Children and juveniles must not be employed. Only persons are employed who when taking up their job have reached the age of 15 or passed the compulsory school age. (ILO-Agreement 138).

4. Discrimination is forbidden

All employees are exclusively employed on the basis of their ability and suitability. Any kind of different treatment or discrimination of persons because of their descent, colour, religion, nationality, origin, political or union involvement or employment or because of sex or age has to cease. (ILO-Agreement 100 and 111).

5. Appropriate remuneration and occupational advancement

TRIUMPH INTERNATIONAL grants its employees an earned income that is orientated to comparable standards in the relevant country and is within the general remuneration guidelines of TRIUMPH INTERNATIONAL.

Wages and other performance related payments conform to the legal or, for the industry applicable, minimum wage, which is enough to fulfil the basic needs of the employee and also leaves an amount, for free disposal.

Before taking up employment all employees receive in writing understandable information regarding the wage conditions exact particulars regarding their wages for each period of payment.

Capable employees are supported and whenever possible within the framework of the respective personnel development taken into consideration for future management function.

All employees are offered an up to date working environment, whereby the general working conditions were created under protection of the relevant national standards and rules.

6. Job Security and Health & Safety

A safe and hygienic working environment is guaranteed at the place of work. Health and Safety measures are promoted under consideration of up to date knowledge and possible specific dangers within the industry. Prohibited are physical mistreatment, threatening and physical force and mistreatment, unusual punishment or disciplinary measures, sexual and other molestation or intimidation.

7. Regular working hours

Working hours are set according to the current laws and the industry norm. Generally, a working week is not more than 48 hours and all employees receive at least one day off within a period of 7 days. Overtime is voluntary and as a rule restricted to no more than 12 hours per week. Each time this is compensated with an additional overtime payment, provided nothing different is agreed within flexible working arrangements.

Suppliers and Licensees Commitment

TRIUMPH INTERNATIONAL binds contractors, sub-contractors, suppliers and licensees to support and participate in the monitoring of the Code of Conduct; by:

- providing TRIUMPH INTERNATIONAL with the relevant information regarding their activities
- Allowing the work place and activities to be checked at any time
- Recording the names, age, working hours and wage level of all the employees and make this documentation available upon request;
- Informing the employees concerned verbally and in writing regarding the setting up of this Code of Conduct.
- Apart from disciplinary measures, dismissals or other discrimination of employees; passing on information about the keeping of the Code of Conduct.

If a supplier violates one or more of the regulations contained within this Code of Conduct, the company concerned will be approached to instigate immediate measures to correct this. Should the requested corrective measures not be carried out TRIUMPH INTERNATIONAL can stop the actual production, annul existing orders, suspend future orders or terminate the business relationship.

Implementation Rules

TRIUMPH INTERNATIONAL commits itself to take the necessary steps for the implementation of the Code of Conduct; by;

- establishing where responsibility belongs within the Company on all questions in connection with the Code of Conduct.
- instructing in particular supervisors and operational employee representatives in a suitable way regarding the contents of the described standards, recommendations and aims.

- ensuring that all employees know the Code of Conduct. For this purpose TRIUMPH INTERNATIONAL will instigate that the Code of Conduct is translated into the relevant language of each country and displayed in each respective factory and explained to employees in an understandable way.
- product management briefing and informing contractors and suppliers regarding the contents of the Code of Conduct.
- integrating into all contracts with contractors and suppliers as well as licensees the duty to keep to the Code of Conduct and all its regulations.
- checking, within the bounds of possibility and reasonability, that the Code of Conduct is being kept.

Monitoring

TRIUMPH INTERNATIONAL, the European Works Council and the EGV/TBL are setting up a committee for the supervision of the regulations of this Code of Conduct. TRIUMPH INTERNATIONAL is sending 2 representatives to this Monitoring Committee, likewise the Euro-Works Council 2 representatives and EGV/TBL 2 representatives. The committee dictates the tasks and authority of the Monitoring Committee according to the principle of unanimity.

Zurzach, 12th December 2001