

COMPLIANCE

HUGO BOSS
MONEY LAUNDERING POLICY

(QR Version)

INSIDER TRADING AT A GLANCE

The purpose of this Introduction is to enable all of HUGO BOSS's employees to quickly become acquainted with the core elements and provisions of the *HUGO BOSS MONEY LAUNDERING POLICY*:

- I. *HUGO BOSS does not tolerate any violations of applicable anti-money laundering requirements and laws or of the HUGO BOSS standard (see IV).*
- II. *Special caution applies to all employees in the stores, outlets and finance departments.*
- III. *Money laundering is the concealment of the true origin of illegally acquired funds by integrate them into the legal economic and financial cycle (three phases: *placement, layering & integration*).*
- IV. *Local cash limits (limit up to which cash can be accepted and not above) must always be observed. Otherwise, HUGO BOSS has introduced a uniform *global standard* for the prevention of money laundering. This standard is to be applied unless stricter country-specific laws apply.*

According to the standard, *unless there is a cash limit, a money laundering audit / identification must be carried out in the following cases:*

- *Cash payments starting from 10,000 EUR (cash threshold), even if the cash threshold is exceeded by smaller partial amounts taken together (so-called smurfing). Example: A cash payment over 11.000 EUR is unproblematic (because in this case there is no upper cash limit), but an identification of the customer / partner is necessary.*
- *There are general facts that give rise to a *suspicion of money laundering (regardless of the amount!)*.*

- V. *As part of the *identification*, the locally applicable information must be collected, but at least the following:*

Natural persons: name, address, date of birth, place of birth, nationality

Legal persons: company name, legal form, register number, address of the registered office, name of the legal representative.

- VI. *"Know Your Customer" (KYC) - New contractual partners must be identified before the establishment of a business relationship or before the execution of a transaction (see V). In addition, the purpose of the business relationship must be clarified beyond doubt. Any abnormalities (e.g. frequent change of address) must also be reported during the business relationship.*

- VII. *Attention: "Accidental" payments to HUGO BOSS accounts may not be retransferred without consulting the Compliance Department.*

- VIII. *All employees are obliged to contact their supervisor or the Compliance Department in case of doubt or suspicion.*

It should be noted that it is not possible in this introduction to give a complete overview of the topic. All regulations and examples can be found in the guideline that is made available on the HUGO BOSS intranet.