

UK  
MODERN SLAVERY &  
HUMAN TRAFFICKING  
STATEMENT

YEAR 2024

# 1 GENERAL STATEMENT

HUGO BOSS AG<sup>1</sup>, including its subsidiaries, rejects all kinds of modern slavery and human trafficking.

HUGO BOSS does not tolerate any form of child labor or forced labor.

To comply with the UK Modern Slavery Act 2015, HUGO BOSS AG makes this statement pursuant to Section 54 of the Modern Slavery Act 2015 and shows the steps HUGO BOSS is taking to ensure that modern slavery and/or human trafficking is not taking place in any part of our business or in our supply chain.

This statement is valid for the past financial year ending on December 31, 2024.

# 2 OUR ORGANISATION, OUR BUSINESS, OUR SUPPLY CHAIN

HUGO BOSS is a leading company in the premium fashion segment of the apparel market. Headquartered in Metzingen (Germany), the Company employs around 18,500 employees generating annual sales of about EUR 4.3 billion in the financial year 2024. The HUGO BOSS group is made up of 60 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 five production companies.

## 2.1 OUR BUSINESS

HUGO BOSS, a global fashion and lifestyle company positioned in the premium segment, is one of the leaders in offering high-quality women's and men's apparel. The Company pursues a portfolio strategy, currently consisting of two strong brands – BOSS and HUGO. While both brands are clearly distinguished by their individual attributes, they share the same high standards in terms of quality and innovation.

These brands present a comprehensive product portfolio including classic to modern apparel, elegant evening clothing and sportswear, shoes, leather accessories, and product groups marketed under license - including fragrances, eyewear, watches, children's fashion, textiles for the home, and instruments for writing.

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<sup>1</sup> This statement applies to HUGO BOSS AG and the main Group companies included in the consolidated financial statements. Main consolidated Group companies are: HUGO BOSS UK Limited, HUGO BOSS (Schweiz) AG, HUGO BOSS Australia Pty. Ltd., HUGO BOSS Benelux B.V. y CIA S.C., HUGO BOSS Benelux Retail B.V., HUGO BOSS Beteiligungsgesellschaft mbH, HUGO BOSS Canada, Inc., HUGO BOSS China Retail Co. Ltd., HUGO BOSS Fashions, Inc., HUGO BOSS France SAS, HUGO BOSS International B.V., HUGO BOSS Internationale Beteiligungs-GmbH, HUGO BOSS Italia S.p.A., HUGO BOSS Retail, Inc., HUGO BOSS Textile Industry Ltd., HUGO BOSS Ticino S.A., HUGO BOSS Trade Mark Management GmbH & Co. KG, HUGO BOSS Vermögensverwaltungs GmbH & Co. KG, Lotus Concept Trading (Macau) Co. Ltd., Lotus (Shenzhen) Commerce Ltd.

## 2.2 OUR SUPPLY CHAIN

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. The HUGO BOSS Group 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.

## 3 POLICIES CONCERNING TO SLAVERY & HUMAN TRAFFICKING

HUGO BOSS has implemented a Code of Conduct, a Supplier Code of Conduct and a number of policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- [HUGO BOSS Code of Conduct\\*](#)

The HUGO BOSS Code of Conduct is a binding set of rules, which assist when dealing with the challenges, both ethical and legal, that arise in the course of day-to-day work. It prohibits any kind of forced labor.

- [HUGO BOSS Supplier Code of Conduct\\*](#)

The HUGO BOSS Supplier Code of Conduct expresses the general standards relating to observing and complying with business ethics, human rights, labor and social standards as well as environmental standards. It is based on the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Core Conventions of the International Labour Organization (ILO) and the Guidelines of the Organisation for Economic Co-operation and Development (OECD) for Multinational Enterprises. Our suppliers are obliged to comply with the HUGO BOSS Supplier Code of Conduct, and they must inform their subcontractors and sub-suppliers about these standards.

In the chapter "Forced Labor and Modern Slavery" HUGO BOSS makes clear that we will not tolerate any form of forced labor or modern slavery and points out our expectations to all HUGO BOSS suppliers. Furthermore, the chapters on "Child Labor", "Indigenous People and Local Communities" and "Third-party Recruitment" underline that respect for human rights and basic freedoms are a top priority for HUGO BOSS.

- [HUGO BOSS Supplier Code of Conduct Indirect Procurement](#)

The HUGO BOSS Supplier Code of Conduct Indirect Procurement is a shorten version of the Supplier Code of Conduct, developed for the target group of the indirect suppliers of HUGO BOSS. The Code is part of the contract with the indirect procurement suppliers.

- [HUGO BOSS Human Rights Statement\\*](#)

The HUGO BOSS Human Rights Statement communicates our human rights strategy and respective expectations towards our own employees and those of our partners. It highlights that being compliant with local laws, recognized social standards and the ILO core conventions is essential for respecting human rights (including human trafficking and slavery-like practices) of our own employees and those of our partners. The identification of human rights risks within our own business areas 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. In 2024, we began updating the statement to further enhance our approach to identifying, addressing, and mitigating human rights risks across our operations and supply chains, and officially adopted the updated policy in 2025.

- HUGO BOSS Human Rights Policy\*

The HUGO BOSS Human Rights Policy informs all employees and partners about the meaning and importance of human rights. HUGO BOSS educates employees about human rights and encourages them to report any human rights violation if they occur at HUGO BOSS or one of its partners. A special focus is put on the topics modern slavery and forced labor. In 2024, we began updating the policy to further strengthen our commitment to protecting human rights across all areas of our business, and officially adopted the updated policy in 2025.

- HUGO BOSS Child and Forced Labor Policy\*

The HUGO BOSS Child and Forced Labor Policy clarifies the position of HUGO BOSS about child and forced labor, including slavery and human trafficking. Additionally, this policy outlines how HUGO BOSS responds to this violation against the HUGO BOSS Supplier Code of Conduct. In 2024, we began updating the policy to reinforce our dedication to eliminating child and forced labor within our supply chain and operations, and officially adopted the updated policy in 2025.

- Responsible Purchasing Guideline

Responsible purchasing practices are vital for promoting fair working conditions and wages across our supply chain. In 2024, HUGO BOSS developed Responsible Purchasing Guidelines set to be communicated internally in 2025. These guidelines emphasize trust-based and equitable partnerships, long-term collaborations, responsible exit strategies, efficient production planning, and open dialog with suppliers on order management and payments.

- Other Commitments\*

On our Group's website, HUGO BOSS is publishing further activities and commitments on current human rights and social issues.

(\* Documents available via the following [link](#).)

## 4 DUE DILIGENCE PROCESSES AND RISK ASSESSMENT

HUGO BOSS has a zero-tolerance policy against forced labor, human trafficking, and modern slavery. But still the company is aware of the risks of modern slavery and human trafficking in global supply chains. Modern slavery and human trafficking are not only a danger or an immediate threat for workers in specific countries, it's a global risk for the security and freedom of workers around the world.

In our direct sphere of influence at our partners, HUGO BOSS systematically focuses on identifying actual human rights violations and consequently on minimizing or ending them jointly with our partners. Additionally, HUGO BOSS has established contractually binding standards for partners. All suppliers who start to work with HUGO BOSS must accept the HUGO BOSS Supplier Code of Conduct (for details see [HUGO BOSS Annual Report 2024](#)) and the HUGO BOSS general terms and conditions. It's mandatory for the suppliers to comply with and to inform their subcontractors and sub-suppliers about these standards. HUGO BOSS monitors all direct suppliers of its global supply chain and assesses them regularly using a risk-based approach.

The HUGO BOSS 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 assessment of (1) countries of origin and (2) industries and also sends out (3) self-assessments in order to derive further partner-specific risks.

Based on those systematic insights of the risk assessment HUGO BOSS develops specific measures to prevent and remedy human rights 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. Amongst other topics, important issues like child labor, human trafficking and slavery-like practices are examined.

If suppliers violate the HUGO BOSS Supplier Code of Conduct an action plan is issued, requesting them to improve compliance immediately (for details see above mentioned HUGO BOSS policies). If a supplier fails to make progress against the plan, they may be subject to sanctions up to and including termination of the business relationship.

HUGO BOSS recognizes that further development of social compliance management together with other stakeholders in the textile value chain is an important requirement for systematic changes. Therefore, we participate in multi-stakeholder initiatives that help us to evaluate and address the risk of child and forced labor in our industry and supply chains. HUGO BOSS joined the Fair Labor Association (FLA) in 2014 to promote and protect employee rights and to advance improvements to working conditions. In 2015, the Company became a member of the German Partnership for Sustainable Textiles (Textilbündnis). HUGO BOSS has also been a member of the Bangladesh Accord since 2016 and joined its successor organization, the International Accord for Health and Safety in the Garment and Textile Industry in 2021. Following its initiation in Bangladesh, HUGO BOSS has also joined the Pakistan Accord in 2023.

## 5 OUR WHISTLEBLOWING SYSTEM

To identify hidden risks and to protect all employees from slavery or human trafficking, HUGO BOSS has several complaints channels enabling anyone to report potential cases in their preferred way. One can choose to contact the person responsible at HUGO BOSS directly, confidentially through the HUGO BOSS Speak Up Channel or an independent external Ombudsperson (both channels are available in several languages and include a hotline).

HUGO BOSS Speak Up Channel or  
by scanning this QR code:



Contact information for the  
HUGO BOSS Ombudsperson:

Dr. Carsten Thiel von Herff  
External lawyer  
International number: 00800 6628376266  
Mobile: + 49 151 58 23 03 21  
E-Mail: [ombudsmann@thielvonherff.com](mailto:ombudsmann@thielvonherff.com)

Thiel von Herff Rechtsanwaelte  
Loebellstrasse 4  
33602 Bielefeld  
Germany

Employees of suppliers can use the same confidential channels. They learn of the existence of those complaints channels through posters at the production sites, information cards handed out during on-site social compliance audits, information on the HUGO BOSS group's website and HUGO BOSS Whistleblowing Policy.

## 6 EFFECTIVENESS REVIEW

HUGO BOSS conducts regular human rights risk analysis to evaluate the actual and potential impact of its business activities on individuals. This analysis distinguishes between supplier risks, country risks, and industry risks.

HUGO BOSS conducts and evaluates human rights self-assessments to identify potential risks and on-site social audits to uncover actual violations. If necessary, specific measures are implemented to ensure that slavery and human trafficking is not taking place in its supply chains. The main indicator of effectiveness is the audit performance levels of the direct suppliers, especially in the field of social compliance (including measures against slavery and human trafficking). To be transparent and demonstrate progress in this field of action, HUGO BOSS reports the relevant figures in the Company's Annual Report. In 2024 no cases of slavery or human trafficking were identified.

As accredited member of the Fair Labor Association (FLA), HUGO BOSS is monitored by this non-governmental organization regularly. This includes audits, which also concentrate on modern slavery and human trafficking at the HUGO BOSS production sites and throughout the entire supplier network.

## 7 TRAININGS

All our employees undergo an annual compliance training also covering human rights topics. This training is mandatory and available to all employees. Additionally, we offer a specialized training program for our colleagues in the operational departments, focusing on the identification of social compliance violations.

Before we start a business relationship with a supplier, they must successfully complete an online training course on our social standards, including the topic of forced and modern slavery. Moreover, we are having topic-specific trainings for our suppliers. In addition, we have newly implemented "ESG Legal Live Sessions" for our suppliers to keep them informed about legal developments regarding ESG topics and their implications.

Our internal and external audit staff consists of experienced and well-trained auditors.

## 8 APPROVAL OF THIS STATEMENT

This updated statement was approved by the Managing Board and signed on its behalf by the Chief Executive Officer of HUGO BOSS AG and Managing Director of HUGO BOSS UK Limited.



Daniel Grieder  
HUGO BOSS AG  
Chief Executive Officer

Date: June 2025



Jörg Horcher  
HUGO BOSS UK Limited  
Managing Director

Date: June 2025