

Code of Business Conduct and Ethics

MYTHERESA

Message from the CEO



As a leading e-commerce platform for luxury clothing, bags, shoes, and accessories, we offer the finest edit in luxury for our customers from more than 200 of the world's most coveted brands presented through a customer, first, digital experience.

Our more than 30 years of market insights and long-standing relationships with the world's leading luxury brands have established us as a global authority in luxury fashion.

Honest, lawful and ethical conduct, together with our love for luxury fashion, forms the basis for the strong and successful relationships we seek to build and maintain with our customers, business partners and shareholders.

The Mytheresa Group Code of Business Conduct and Ethics (this "Code") reflects the principles that form our core values and corporate culture. We are committed to observing these principles in all aspects of our business operations without exception.

I believe that the way we work together, act as professionals and strive to exceed our customers' expectations every day will underpin the ongoing success of the Mytheresa Group.

A handwritten signature in blue ink, which appears to read "Michael Kliger". The signature is fluid and cursive.

Michael Kliger, CEO Mytheresa Group

Code of Business Conduct and Ethics

The Mytheresa Group (or the “Company”) consists of MYT Netherlands Parent B.V. and its subsidiaries, including amongst others mytheresa.com GmbH, mytheresa.com Service GmbH, Theresa Warenvertrieb GmbH, Mytheresa Group GmbH, Mytheresa U.S. Services Inc. and Mytheresa Business Information Consulting (Shanghai) Co. Ltd. We are committed to a high standard of ethical conduct and compliance with applicable laws and regulations. This Code sets expectations and guides our behavior towards each other, our customers, brands and other parties. We expect all of our agents, consultants and business partners to comply with this Code when providing Services.

This Code applies to our employees as well as members of our Management and Supervisory Boards and is intended to meet the standards of a code of ethics under German law, the Dutch Corporate Governance Code, the Sarbanes-Oxley Act of 2002, as amended, and the standards of a code of business conduct and ethics under the listing standards of the NYSE unless otherwise disclosed in the Company’s annual Form 20-F filings. This Code does not cover every issue that may arise, but instead gives basic principles for you to follow. This Code may refer to separate, specific policies and procedures.

Act with respect

Act with respect



Respect everybody, fully embrace diversity and treat others as you would like to be treated.
Care for our values and keep to our company rules.
Cherish our invaluable brand relations and treat our luxurious products with utmost care.
Remember that you are an ambassador of Mytheresa in everything you do.

MYTHERESA
THE FINEST EDIT IN LUXURY FASHION

This Code is designed to ensure that our business activities always conform to the highest ethical, legal and professional standards

1. Respect our Code

Without exception, all employees, officers and members of our Management and Supervisory Boards must read and understand this Code, uphold its principles and comply with its policies and procedures on a daily basis. Violations of this Code may result in disciplinary action, up to and including discharge.

2. Honest, Lawful and Ethical Behavior

We require all of our employees to be honest, act lawfully and maintain high ethical and professional standards at all times. Our employees, officers and members of our Management and Supervisory Boards must comply with applicable laws and regulations. Violations will not be tolerated.

3. Respect for Each Other, the Environment and Human Rights

We are committed to a safe, inclusive and constructive work environment. This includes provision of safe working conditions and mental health care, compliance with applicable labor laws, and embracing diversity as a fundamental factor for success. Respect for each other and the international standards of fundamental human rights are of utmost importance to us in our daily operations.

4. Respect and Commitment to Non-Discrimination, Diversity & Inclusiveness

We are committed to take a stance against discrimination inside and outside our company. The Mytheresa Group is an equal opportunity employer and we do not accept any form of discrimination, harassment or bullying. We require all our employees to report discrimination and harassment if it occurs to their supervisors. As an employee, officer or member of the Management or Supervisory Board of the Mytheresa Group we ask you to support a more inclusive and equal Mytheresa. For the Mytheresa Group it is to the utmost importance to comply with anti-discrimination legislation on all levels. We are committed to the advancement of women, people of color, LGBTIQ+ -communities and people with disabilities regarding their careers but also everyday life. Lastly, we believe all forms of families and care work are a corner stone of functioning societies.

Be professional

Be professional



Be a contributor others can rely on.

Become an expert in what you do.

Take responsibility for your actions and results.

Be open to other people's perspectives.

Accept critique as a gift.

Be mindful with resources, be it yours, others' or financial.

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The Mytheresa Group expects all of its employees, officers and the members of its Management and Supervisory Boards to act in the best interest of the Company and its shareholders.

5. Company Assets

Acting in the best interest of the Mytheresa Group requires careful management of all Company assets and resources of the Mytheresa Group, including our budgets, our property and products, our business relationships and our reputation. All employees, officers and members of the Management and Supervisory Boards should protect the Mytheresa Group's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. All Company assets should be used for legitimate business purposes.

6. Confidentiality

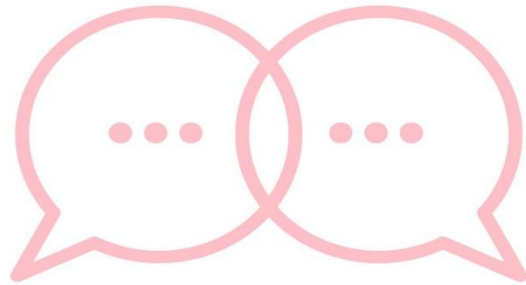
Employees, officers and members of the Management and Supervisory Boards should maintain the confidentiality of information entrusted to them by the Company and its customers and business partners. Sometimes disclosure may be authorized or legally mandated; nonetheless you should confirm this with legal counsel. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company or its customers and business partners, if disclosed. All employees, officers and members of the Management and Supervisory Boards are required to read and familiarize themselves with the section related to secrecy in the Employment Agreement that each employee must sign when joining the Company; obey all laws, rules, regulations and regulatory orders; and exercise common sense in protecting the use and disclosure of Company confidential information. If you have any questions about protecting Company information, please contact the legal counsel of the company.

7. Insider Trading

As an employee, officer or member of the Management or Supervisory Board of the Mytheresa Group you may have access to information not yet disclosed or not available to the general public. Employees, officers and members of its Management Board and Supervisory Board in possession of material non-public information about the Mytheresa Group or companies with whom we do business must abstain from trading or advising others to trade in the respective company's securities until an adequate public disclosure is made. Material information is information of such importance that it can be expected to affect the judgment of investors as to whether or not to buy, sell, or hold the securities in question. To use non-public information for personal financial benefit or to "tip" others, including family members, who might make an investment decision based on this information is not only unethical but also illegal. For additional information, please refer to the Company's Insider Trading Policy, which has been provided to you, if applicable to you, or is available upon request to the legal counsel.

Be transparent and direct

Be transparent & direct



Share relevant and appropriate information openly and actively.

Be proactive in getting the information you need to succeed.

Bring up all topics for discussion and commit to decisions once they are made.

Be confident to stand up against any forms of discrimination.

Give constructive and direct feedback to others.

Seek honest feedback for yourself.

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The Mytheresa Group expects all of its staff to be transparent, direct and act with integrity. We do not participate in or tolerate any kind of illicit or unethical behavior.

8. Conflicts of Interest

Any kind of conflicts of interest (actual or perceived) should be avoided at all times. If a conflict of interest does arise, it must be promptly disclosed to your supervisor. Conflicts of interest typically arise in situations where one's private interests and/or relations might improperly influence decisions. Decisions made by or on behalf of the Mytheresa Group should always be made based on objective criteria such as quality, price and reliability. Conflicts of interest related to executive officers or Supervisory Board members must be promptly disclosed to the Supervisory Board.

9. Corporate Opportunities

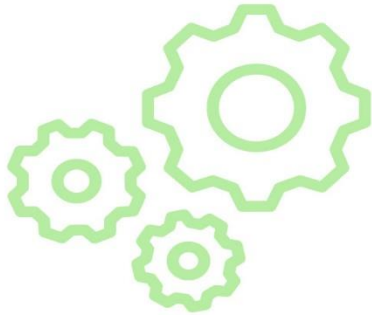
Our staff owes the Mytheresa Group the duty to advance its legitimate interests when the opportunity arises. It is prohibited to our employees, officers and members of our Management and Supervisory Boards to personally take advantages of opportunities that show up whilst the use of corporate property or through an information or position; it is not allowed to use our corporate property, information, or position for personal gain or compete with us in the market.

10. Information Requirements

The Mytheresa Group aims to create value for our shareholders. We strive to provide our shareholders with relevant information for their investment decisions, promptly and without discrimination. We are committed to providing full, fair, accurate, timely and understandable disclosure in all reports and documents filed with or submitted to, the Securities and Exchange Commission (the "SEC") and all other governmental, quasi-governmental and self-regulatory bodies and in our other public communications. Employees, officers and Management and Supervisory Board Members are required to abide by the standards, policies and procedures designed to promote compliance with this Code.

Create a strong team

Create a strong & diverse team



Enable your team to be successful.
Take responsibility for your own developmental needs.
Put the company's interests first and your ego second.
Be an advocate for diversity & inclusion at Mytheresa.
Be an active team member and contribute to our success;
each one of us matters.

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Building and maintaining strong and reliable business relationships is of the utmost importance to the Mytheresa Group.

11. Business Partner Compliance

We encourage our business partners to also commit themselves to high standards of ethical behavior and adopt similar internal guidelines to ensure compliance with applicable laws and regulations.

12. Competition Law

We believe that fair competition is a driver for excellence. The Mytheresa Group is committed to safeguarding and maintaining unbiased competition and always acting in accordance with applicable antitrust and competition laws. Therefore, we do not enter into agreements with competitors which could result in an unlawful limitation on competition. We do not use our market position to discriminate against others.

13. Fair Dealing

We commit ourselves to deal fairly with the Mytheresa Group's customers, suppliers, competitors and staff. We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

Love our customers

Love our customers



Love our customers – we want them to love us in return.
Treat every customer as an individual.
Exceed customer expectations.
Delight and inspire them in everything you do.
Measure all ideas and activities against the
expected customer value.

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The Mytheresa Group highly values our customers. Their satisfaction is at the core of our business.

14. Communication

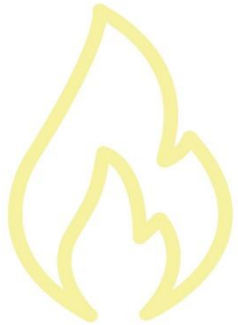
We are always clear and truthful when communicating with our customers. We are focused on our customers' needs and put all of our efforts into a great customer experience. Our employees, officers and members of the Management and Supervisory Boards should always ensure that private activities and statements of opinion are not associated with the Mytheresa Group.

15. Data Protection

We are committed to protecting personal data against unauthorized collection, processing, retention, modification, distribution, disclosure or deletion, and to only handle personal data in accordance with the requirements of applicable data protection law. It is part of the responsibility of every employee at Mytheresa Group to protect the personal data entrusted to us by our customers against unlawful processing and misuse. For additional information please refer to the Mytheresa Dataprotection Guideline.

Work passionately

Work passionately



Demonstrate a positive, can-do mindset.
Work hard and celebrate success.
Recognize the passion and success of others.
Promote an energizing and positive working environment.

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We continuously work to make Mytheresa the number one shopping destination for luxury clothing, bags, shoes, and accessories. We expect each of our employees to give their absolute best within their area of responsibility to contribute to the Mytheresa Group's business success and maintain a corporate culture of honesty and integrity.

16. Trade Compliance

The Mytheresa Group takes precautionary measures to ensure compliance with applicable national and international sanctions, embargo regulations, and other restrictions of foreign trade legislation.

17. Anti-Money Laundering

We always strive to be the best while conducting our business within the legal limits. This means that we are committed to integrity and working only with reputable third parties involved in legitimate business activities. We take our obligation to avoid money laundering seriously and screen customer transactions made in cash when exceeding a defined threshold.

Be creative in a smart way

Be creative in a smart way



Always challenge the status quo for the better.
Take risks and learn from your mistakes.
Focus on innovation that improves our business.
Encourage others to be creative.

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Mytheresa Group cherishes creativity and innovation as key drivers to business success. Strong commitment to the rules of the Code of Conduct serves as the foundation of the Mytheresa Group's daily business and aims at giving guidance to our staff when facing new or unfamiliar situations.

18. Risk Awareness

When facing new situations, we expect our staff to always act mindfully and in line with our commitment to ethical and sustainable business. We require our employees, officers and members of our Management and Supervisory Boards to report identified risks that may jeopardize the achievement of the Mytheresa Group's objectives.

19. Whistleblowing

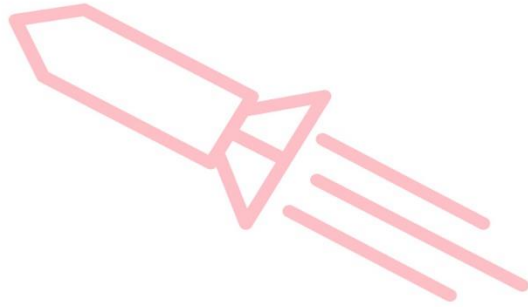
Every employee of the Mytheresa Group is responsible for reporting any kind of suspected or actual violation of this Code or any applicable law, rule or regulation immediately by informing the responsible Manager or through our whistleblower system which is available amongst others via our intranet MYT Connect under the button „Report something“ or via post to: Mytheresa Compliance Department, Einsteinring 9, 85609 Aschheim. The post address can also be used by externals to report something. The Mytheresa Group will promptly initiate an investigation to gather the relevant facts as set forth in our Whistleblower Policy. The Whistleblower Policy also contains information on the type of violations which can be reported via the whistleblower system as well as further important information on the use of the whistleblower system under applicable local law.

20. No Retaliation

It is a violation of this Code to retaliate in any way against any employee for reporting, in good faith, that a violation of this Code may have occurred or is about to occur. Prohibited forms of retaliation include adverse employment actions (such as termination, suspension and demotion), the creation of a hostile work environment and any other type of reprisal for the good-faith reporting of a possible violation of this Code. If any employee is retaliated against for a report made in good faith of any suspected violation of laws, rules, regulations or this Code, it is cause for appropriate disciplinary action.

Make it happen

Make it happen



Act like an entrepreneur and get things done.
Drive the topline and growth of Mytheresa.
Embrace change as a constant in digital luxury fashion.
Focus on great business impact rather than perfection.

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Mytheresa values a quick achievement of results. But we do not tolerate any illegal actions and disregard for the longer-term outcomes

21. Sustainable Growth

We believe that sustainable economic success is inseparable from compliance with this Code and applicable law, rules and regulations. The success and reputation of the Mytheresa Group depends on the work and conduct of each member of the company.

22. Anti-Corruption

We value integrity and transparency and prohibit corrupt practices, be it active or passive, in all our business dealings. It is our policy to comply with all anti-corruption laws that apply to our operations. Violations of anti-corruption laws represent serious crimes may lead to considerable damage for individual employees and for the Mytheresa Group. Employees, officers and members of our Management and Supervisory Boards shall not demand, accept, offer or grant any personal benefit in connection with any business activity with the intent to influence any kind of decision or obtain an improper advantage on behalf of the Mytheresa Group.

Waivers of the Code of Business Conduct and Ethics

The Supervisory Board or our audit committee may from time to time delegate the authority to waive certain provisions of this Code. In addition, this Code may be amended from time to time by the Supervisory Board. Any waiver of this Code relating to conflicts of interest, corporate opportunities, confidentiality, fair dealing, Company assets or compliance with securities laws with respect to a member of the Supervisory Board or the Company's chief executive officer, chief financial officer or persons performing similar functions must be approved by the Supervisory Board or our audit committee and must be promptly disclosed in a Form 6-K or on the Company's website within four business days.

No Rights Created

This Code is a statement of certain fundamental principles and policies and procedures that govern the officers, employees and members of the Management and Supervisory Boards in the conduct of our business. It is not intended to and does not create any rights in any employee, officer, Management or Supervisory Board member, supplier, borrower, competitor, ADS holder or any other person or entity.

Publication of this Code

The Company shall make the most current version of this Code publicly available by placing it on the Company's website at www.mytheresa.com. This Code is also available in print to any holder of ADSs who requests it.

Additional Information

Strong commitment to this Code serves as the foundation of the Mytheresa Group's daily business. We aim to provide our staff with guidance or additional information when facing new or unfamiliar situations regarding any of the information contained in this Code. Please contact the legal counsel and compliance officer of the company with any questions or requests for additional information.

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