

A hand is shown holding a crystal ball. The crystal ball reflects a lush green forest scene with a bright sun flare at the top. The background is a blurred view of real trees and a blue sky with white clouds. The text 'OUR BRANDS' is written in a white, sans-serif font, curved around the right side of the crystal ball.

OUR BRANDS

ETHICAL  
POLICIES

# BRAND DIRECTORY

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American Apparel®

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ASQUITH & FOX®

Page 17 AWDIS Just Cool®



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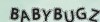
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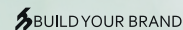
Page 25 Bella & Canvas®

BELLA+CANVAS

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CRAGHOPPERS

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FINDEN+HALES

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Page 43 Front Row



Page 40 Fruit of the Loom®



Page 45 Gamegear®

GAMEGEAR®

Page 45 Gamegear®  
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Page 41	Glenmuir	<b>GLENMUIR</b> R97
Page 43	Henbury	<b>HENBURY</b>
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We take care to ensure that the information within this document is correct, however, individual brand details may be subject to change at any time. Industry standard accreditations listed per brand are provided as a point of reference, more detailed product information can be found on our website, please refer to the Marketing Hub, Brand Specification Sheets.

All brand information on 'Our Brand Ethical Policies' is correct to the best of our knowledge March 2020.

# Supplier Initiatives

Many of our suppliers adhere to several internationally recognised industry standards and guidelines to ensure ethical and social impacts of their actions are accounted for. Further insight into such initiatives are shown below, please refer to their respective websites for further information.



For workers' rights.  
For better business

## Ethical Trading Initiative - [www.ethicaltrade.org](http://www.ethicaltrade.org)

For more than 20 years, ETI and our members have been a driving force in ethical trade. We influence business to act responsibly and promote decent work. Taking a unique approach to business and human rights, our members are forward-thinking companies, trade unions and NGOs. Together, we tackle the complex challenges of today's global supply chains, improving the lives of workers worldwide.



## BSCI - The Business Social Compliance Initiative - [www.bsci-intl.org](http://www.bsci-intl.org)

The Business Social Compliance Initiative (BSCI) is a leading supply chain management system that supports companies to drive social compliance and improvements

within the factories and farms in their global supply chains. BSCI implements the principle international labour standards protecting workers' rights.



## Fair Labor Association - [www.fairlabor.org](http://www.fairlabor.org)

Since 1999, FLA has helped improve the lives of millions of workers around the world. As a collaborative effort of socially responsible companies, colleges and universities, and civil society organizations, FLA creates lasting solutions to abusive labor practices by offering tools and resources to companies, delivering training to factory workers and management, conducting due diligence through independent assessments, and advocating for greater accountability and transparency from companies, manufacturers, factories and others involved in global supply chains.



## FWF Fair Wear Foundation - [www.fairwear.org](http://www.fairwear.org)

Fair Wear Foundation (FWF) is a non-profit organisation that works with garment brands, factories, trade unions, NGOs and governments to improve working conditions for garment workers in 11 production countries across Asia, Europe and Africa.



## Fairtrade - [www.fairtrade.org.uk](http://www.fairtrade.org.uk)

By requiring companies to pay sustainable prices (which

must never fall lower than the market price), Fairtrade addresses the injustices of conventional trade, which traditionally discriminates against the poorest, weakest producers. It enables them to improve their position and have more control over their lives.



## The Global Organic Textile Standard (GOTS) - [www.global-standard.org](http://www.global-standard.org)

The aim of the standard is to define world-wide recognized requirements that ensure organic status of textiles, from harvesting of the raw materials, through environmentally and socially responsible manufacturing up to labelling in order to provide a credible assurance to the end consumer. Textile processors and manufacturers are enabled to export their organic fabrics and garments with one certification accepted in all major markets.



## ISO 9001: Quality management systems - [www.iso.org](http://www.iso.org)

ISO 9001:2015 specifies requirements for a quality management system when an organization needs to demonstrate its ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements, and aims to enhance customer satisfaction through the effective application of the system,



including processes for improvement of the system and the assurance of conformity to customer and applicable statutory and regulatory requirements.



#### **OEKO-TEX® - [www.oeko-tex.com](http://www.oeko-tex.com)**

The product labels STANDARD 100 by OEKO-TEX® and LEATHER STANDARD by OEKO-TEX® are available for textile and leather products that have been tested for harmful substances and which are thus safe from a human-ecological perspective. With the MADE IN GREEN by OEKO-TEX® label, you can identify textiles which have been tested for harmful substances and also manufactured under sustainable working conditions. The STeP by OEKO-TEX® certification and the DETOX TO ZERO analysis by OEKO-TEX® optimise the manufacturing process for ecological and socially responsible textile and leather production.



#### **PETA - Approved Vegan - [www.peta.org.uk](http://www.peta.org.uk)**

The "PETA - Approved Vegan" logo allows companies that sell apparel, accessories, furniture, or home decor to highlight their vegan offerings, helping consumers find animal-free products at a glance and make purchases that align with their values.



#### **REACH**

##### **Registration, Evaluation, Authorisation and Restriction of Chemicals - [www.hse.gov.uk/reach](http://www.hse.gov.uk/reach)**

REACH is a European Union regulation concerning the Registration, Evaluation, Authorisation and restriction of Chemicals. REACH has several aims: protection of human health and the environment from the use of chemicals, manufacturers and importers responsible for understanding and managing the risks associated with their use, free movement of substances on the EU market, enhance innovation in and the competitiveness of the EU chemicals industry, and promote the use of alternative methods for the assessment of the hazardous properties of substances.



#### **Sedex® - [www.sedexglobal.com](http://www.sedexglobal.com)**

Sedex® is a global membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. Sedex® provides a range of tools, services, guidance and training to help companies map and manage risks in their supply chain.



#### **SAI - Social Accountability International : SA8000® Standard - [www.sa-intl.org](http://www.sa-intl.org)**

Social Accountability International (SAI) is a global non-

governmental organization advancing human rights at work. SAI's vision is of decent work everywhere – sustained by an understanding that socially responsible workplaces benefit business while securing fundamental human rights.



#### **Textile Exchange - [www.textileexchange.org](http://www.textileexchange.org)**

Textile Exchange is a global non-profit that works closely with our members to drive industry transformation in preferred fibers, integrity and standards and responsible supply networks. We identify and share best practices regarding farming, materials, processing, traceability and product end-of-life in order to reduce the textile industry's impact on the world's water, soil and air, and the human population.



#### **NCWA - The National Children's Wear Association - [www.ncwa.co.uk](http://www.ncwa.co.uk)**

The NCWA works on behalf of the whole of the childrenswear industry. It monitors safety in the design of all aspects of children's wear.





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## OCS - The Organic Content Standard

[www.soilassociation.org](http://www.soilassociation.org)

The Organic Content Standard (OCS) relies on third-party verification to verify a final product contains the accurate amount of a given organically grown material. It does not address the use of chemicals or any social or environmental aspects of production beyond the integrity of the organic material. The OCS uses the chain of custody requirements of the Content Claim Standard (CCS).

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**United Nations**  
Global Compact

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## UN Global Compact - [www.unglobalcompact.org](http://www.unglobalcompact.org)

UN Global Compact is a voluntary initiative based on CEO commitments to implement universal sustainability principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals.

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## WRAP - Worldwide Responsible Accredited Production - [www.wrapcompliance.org](http://www.wrapcompliance.org)

The WRAP Certification program's objective is to independently monitor and certify compliance with standards, to ensure that sewn products are being produced under lawful, humane and ethical conditions.

Their standards consist of: Compliance with Laws and Workplace Regulations, Prohibition of Forced Labor, Prohibition of Child Labor, Prohibition of Harassment or Abuse, Compensation and Benefits, Hours of Work, Prohibition of Discrimination, Health and Safety, Freedom of Association and Collective Bargaining, Environment, Customs Compliance, and Security.



# OUR BRANDS





### Ethical Statement

At 2786, we take great strides to ensure our ethical performance is just as good as the performance of our outdoor jackets.

We go out of our way to avoid using any harmful, banned or restricted chemicals that could be unsafe. Products are manufactured using certified fabrics to the OEKO-TEX® STANDARD 100, so you can rest assured that our clothing has been tested by independent experts and contains nothing on the restricted substance list of Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulations or the ECHA SVHC Candidate List. 2786 outdoor jackets also comply with the EU general product safety directive regulations as no harmful substances, dyes or colourants are used during our manufacturing processes.

We also have a great reputation when it comes to social compliance. We adhere to the labour principles set out in the amfori BSCI Code of Conduct. We only select factories that achieve high standards and respect workers' rights, including offering decent working hours. Maintaining these standards ensures all our outdoor clothing has been produced in a fair, honest and legal way, without exploiting the people who make it.

### Plastic Statement

We need to protect our clothing on its journey from factory to end user, this means that a certain

level

of packaging is required to prevent soiling or damage during transit.

All our jackets are individually packed in recyclable polythene bags, we use recycled board in our cartons

and recycled wooden pallets for shipping. As well as this we are currently trialling a compostable biodegradable substitute to the recyclable polythene garment bags.

We insist and encourage all supply partners to pursue correct environmental practices, especially the

recycling of waste materials and the recirculation of waste heat generated in the dyeing process.

As an importer/exporter, we also support and pay a sizeable levy into the Packaging Waste Directive based on volumetric weight relative to what we import/export, in order that the plastic and cardboard

we place on the market in the UK and EU can be reused.

Whilst recognising that packaging is inevitable in our industry, we want to demonstrate how we've cut

down on the materials used and improved the recyclability of these materials, so the environmental

impact is kept to an absolute minimum.

As a brand we have reduced and removed where we can any unnecessary packaging throughout our supply chain and carry this ethos forward into our daily working lives. In our head office we have recycling

points for toner cartridges, cardboard, paper and polyethylene plastic. Going forward we plan to use biodegradable packaging when sending any samples through our suppliers to customers.

As well as working to improve our eco-footprint within our packaging we have always used recycled

labelling, trims and materials wherever possible.



### **Ethical Statement**

Our mission is to be the best sports company in the world. Best means that we design, build and sell the best sports products in the world, with the best service and experience and in a sustainable way.

In fulfilment of this mission, we expect our partners – contractors, subcontractors, suppliers, and others – to operate sustainably and to conduct themselves with the utmost fairness, honesty and responsibility in all aspects of their business.

We use the adidas Workplace Standards as a tool to assist us in selecting and retaining business partners who follow business practices consistent with our policies and values. As a set of guiding principles, the Workplace Standards also help identify potential problems so that we can work with our business partners to address issues of concern as they arise. Business partners will develop and implement action plans for continuous improvement in factory working conditions. Progress against these plans will be monitored by the business partners themselves, our internal monitoring team and external independent monitors.

Specifically, we expect our business partners to operate workplaces where the following standards and practices are implemented:

### **General Principle**

Business partners must comply fully with all

legal requirements relevant to the conduct of their businesses and must adopt and follow practices which safeguard human rights, workers' employment rights, safety and the environment.

### **Human Rights**

adidas is committed to respecting human rights and will refrain from any activity, or entering into relations with any entity, which supports, solicits or encourages others to abuse human rights. We expect our business partners to do the same, and where there is any perceived risk of a violation of human rights to duly notify us of this and of the steps being taken to avoid or mitigate such a breach and, where this is not possible, for the business partner to provide for the remediation of the adverse human rights impact where they have caused or contributed to this. For the purposes of these Workplace Standards, human rights are a set of rights which recognise the inherent dignity, freedom and equality of all human beings, as expressed in the United Nation's International Bill of Human Rights and in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

### **Employment Standards**

#### **Forced Labour**

Business partners must not use forced labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise, or permit the trafficking in persons for the purposes of forced labour. No employee may be compelled to work through force or intimidation of any form, or as a means of political coercion or as punishment for holding or expressing political views.

#### **Child Labour**

Business partners must not employ children who are less than fifteen (15) years old, or less than the age for completing compulsory education in the country of manufacture where such age is higher

than fifteen (15).

### **Discrimination**

Business partners must not discriminate in recruitment and employment practices. Decisions about hiring, salary, benefits, training opportunities, work assignments, advancement, discipline and termination must be based solely on ability to perform the job, rather than on the basis of personal characteristics or beliefs, such as race, national origin, gender, religion, age, disability, marital status, parental status, association membership, sexual orientation or political opinion. Additionally, business partners must implement effective measures to protect migrant employees against any form of discrimination and to provide appropriate support services that reflect their special status.

### **Wages, Benefits & Compensation**

All legal requirements relating to wages and benefits must be met. Wages must equal or exceed the minimum wage required by law or the prevailing industry wage, whichever is higher. In addition to compensation for regular working hours, employees must be compensated for overtime hours at the rate legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate exceeding the regular hourly compensation rate.

Workers have the right to compensation for a regular work week that is sufficient to meet workers' basic needs and provide some discretionary income. Where compensation does not meet workers' basic needs and provide some discretionary income, business partners must take appropriate actions to progressively raise employee compensation and living standards through improved wage systems, benefits, welfare programmes and other services.

### **Working Hours**

Employees must not be required, except in



extraordinary circumstances, to work more than sixty (60) hours per week including overtime or the local legal requirement, whichever is less. A regular work week must not exceed 48 hours, all overtime work must be consensual and not requested on a regular basis. Employees must be allowed at least twenty four (24) consecutive hours rest within every seven-day period, and must receive paid annual leave.

#### **Freedom of Association & Collective Bargaining**

Business partners must recognise and respect the right of employees to join and organise associations of their own choosing and to bargain collectively. Business partners must develop and fully implement mechanisms for resolving industrial disputes, including employee grievances, and ensure effective communication with employees and their representatives.

#### **Disciplinary Practices**

Employees must be treated with respect and dignity. No employee may be subjected to any physical, sexual, psychological or verbal harassment or abuse, or to fines or penalties as a disciplinary measure.

Business partners must publicise and enforce a non-retaliation policy that permits factory employees to express their concerns about workplace conditions directly to factory management or to adidas without fear of retribution or losing their jobs.

#### **Health & Safety**

A safe and hygienic working environment must be provided, and occupational health and safety practices which prevent accidents and injury must be promoted. This includes protection from fire, accidents and toxic substances. Lighting, heating and ventilation systems must be adequate. Employees must have access at all times to sanitary facilities which should be adequate and clean. Business partners must have health and safety policies which are clearly communicated to employees. Where residential facilities are provided to employees, the same standards apply.

#### **Environmental Requirements**

Business partners must make progressive improvement in environmental performance in their own operations and require the same of their partners, suppliers and subcontractors. This includes: integrating principles of sustainability into business decisions; responsible use of natural resources; adoption of cleaner production and pollution prevention measures; and designing and developing products, materials and technologies according to the principles of sustainability.





### Ethical Statement

Dimensions is committed to providing manufacturing quality assurances which fully comply with your standards. Whilst recognising the fact that overseas sourcing of fabric or garments will lead to substantial cost benefits, we are also aware of the potential social impact that offshore supply can have.

As a member of the Ethical Trading Initiative (ETI) since 2007, Dimensions has adopted the internationally recognised ETI Base Code of labour practice (as listed below). We are committed to supporting our suppliers as they implement this code of practice and create a fair and safe working environment for all employees. We are constantly striving to improve working conditions and uphold human rights in an environmentally friendly workplace.

### ETI Base Code:

Please view the full base code on the ETI website.

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised

8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

Dimensions takes all reasonable and practical steps, including factory visits by the company's staff, representatives or agents, to check that required standards are being met, and be alert to any signs which may indicate that a production process may involve exploitation or represent a danger to health, safety, or to the environment.

As part of our membership, we actively participate in different ETI programmes, events, seminars and working groups. These events allow us to collaborate with other ETI members and we can then transfer this information throughout our business and its practices.

It is very important to Dimensions that our workforce is aware of our ETI membership and what it stands for. Members of our purchasing department have attended ETI meetings to provide them with a fundamental understanding on how their purchasing practices can have an impact on ethical trade. Our purchasers are in direct contact with our suppliers so it is of utmost importance that they are fully educated in this area. Members of our account management team and board of directors have also attended ETI meetings to increase their understanding.

Custodians of our ethical trade and CSR operations have also presented at ETI meetings for small and medium companies to explain to members our relationship with our suppliers, what issues we face and how we have developed our supply chain. It is our intention to keep supporting the initiative and learning from the ETI and their other members.

Please find our membership listed on the ETI website:

[www.ethicaltrade.org/about-eti/our-members](http://www.ethicaltrade.org/about-eti/our-members)  
(we are listed under Men's Wearhouse UK (MWUK) [Note 3])

## American Apparel®



### Ethical Statement

We believe that by providing employees with quality employment opportunities in safe and rewarding work environments, we increase the prosperity of not only our employees, but their families and communities as well.

### Safe And Ergonomic Workplaces

Our focus is on creating safe and healthy workplaces for our 50,000 employees through investments in modern equipment and technology, rigorous health and safety programmes as well as carefully engineered worker ergonomics, material handling and process design. Our manufacturing employees have 24/7 access to free on-site medical clinics which provide primary care, free vaccinations and health awareness campaigns throughout the year. In further support of reducing worker strain and potential injury, employees have access to on-site Schools for Back and Shoulder Health for exercise and preventative awareness programmes. 181,075 free medical consultations provided in our 24/7 medical clinics

### Fair Wages

We believe that all employees should be fairly compensated with a wage that covers their basic needs and provides some discretionary income. Our commitment to our employees goes well beyond ensuring fair wages. We strive to provide

benefits that include primary medical care and other wellness programmes, subsidised meals, financial assistance, free transportation and access to training and development programmes that empower our employees both professionally and personally. We understand that our comprehensive training and education programmes, high school education equivalence programmes as well as scholarships for employees' continued professional development hold promise for a better future.

### Freedom Of Association

We recognise our employees' rights to form or join any organisation, including unions, and their right to collectively bargain with the Company. More than 54% of our employees are represented by a union.

### Ethical Employment Practices

All employees have the right to safe and ethically governed workplaces, always free from harassment or prejudice in any form. These rights are upheld through strict adherence to the Company's Code of Conduct and related policies. Employees have access to several grievance mechanisms that allow employees, partners and other stakeholders to report non-compliance with any of our Code elements anonymously and without fear of repercussions. 100% of employees have access to an anonymous Toll-Free Hotline to voice grievances.

### Everyday Apparel, Done Right

Our Code of Conduct and Code of Ethics are the key elements that support our commitment to respecting employees' rights throughout our operations and global supply chain. Our Social Compliance Programme ensures that all of our company-owned facilities, as well as our contractors, comply with our Code of Conduct, local and international laws and best practice industry codes. As part of the Company's on boarding training, all employees are provided

training on our Code of Conduct, employees' rights and health and safety

### Conserving The Environment

As one of the world's largest vertically-integrated manufacturers of textiles and apparel, we are able to uncover efficiencies most brands cannot see. Our founding principles drive us to minimise waste, optimise natural resources and pursue continuous improvements in every aspect of our operations.

Our unparalleled investments in sustainable solutions and innovative technologies have helped reduce our environmental impacts and drive our long-term success. Owning our facilities has allowed us to invest in large-scale systems that have reduced our water usage in the production of our garments by 10% since 2015 and enabled us to power 43% of our energy needs from renewable sources.

We lead the industry with many of our innovations such as our BioTop wastewater treatment system that uses bacteria, sunlight and gravity to treat water in a natural process. Additionally, our BioMass steam generation systems use agricultural and operational waste by-products to produce thermal energy. We are also continuously working to increase water efficiency and piloting research projects to reduce our water extraction loads by reintegrating recovered water back into our processes.

We recycle or re-purpose 86% of our waste, thanks to our investments in equipment and technology and by engineering manufacturing processes to minimise waste. We also recycle process waste from some products to become partial inputs in the production of other products.

### Creating Strong Communities

We are committed to playing an active role in local communities through a wide range of projects focused on youth education, active living, the environment and entrepreneurship. We create value for communities and our company by strengthening social programmes and supporting economic development.

## Community Engagement

We create opportunities for employees to connect with their communities and give something back through employee fundraising or volunteering initiatives. In 2017, we partnered with Pencils of Promise through our American Apparel™ brand to help raise awareness and support for child literacy. The Pencils of Promise collection contributed U.S. \$220,000 in 2017 to build new schools, improve classroom environments and provide support for teachers in Guatemala and Ghana.

## Developing Local Economies

Gildan is proud of the positive economic impact we create beyond the scope of our operations and direct employment. Over the last 15 years, we have led the industry in developing local infrastructure in our communities and assisting in the development of local businesses, with the goal of creating stronger communities in these regions. One of the Company's initial philosophies in expanding production into the regions where we operate was to "think globally, but manage locally" by favouring local management and supporting the development of local supply chains. We have implemented extensive training and development programmes for our employees, providing them with opportunities to develop and grow within the Company.

## Developing Local Economies

We understand that our Company is part of a bigger whole. We believe that proactive stakeholder engagement is a big part of operating responsibly and achieving our goals. The common goals we share with our stakeholders are improving the lives of the people involved in manufacturing our products, ensuring an ethical and stimulating work environment, and respecting and enhancing the local communities in which we operate. Our Company is proud to be associated with leading industry standards and NGO's and to participate in global sustainability initiatives such

as:

- Fair Labor Association (FLA)
- Worldwide Responsible Accredited Production (WRAP)
- Oeko-Tex Standard 100
- ILO Better Work - Haiti
- Sustainable Apparel Coalition (SAC)
- Carbon Disclosure Project (CDP)
- Supplier Ethical Data Exchange (SEDEX)

## Recognitions

We have developed our strong programmes because of a fundamental belief that operating responsibly and sustainably drives our business success. We are also quite proud to be recognised for our industry leadership.

## Dow Jones Sustainability Index

In 2017 Gildan was included in the Dow Jones Sustainability Index for the fifth consecutive year.

## Bronze Class Distinction in the Robecosam 2017 Sustainability Yearbook

For the fifth consecutive year, Gildan has qualified for inclusion in the RobecoSAM Sustainability Yearbook, receiving the Bronze Class distinction this year for its strong sustainability performance.

## Distintivo ESR® Award

Gildan received the Distintivo award for the 2nd year. Distintivo ESR® aims to recognise companies' efforts to voluntarily and publicly undertake the commitment to implement socially responsible management and continuous improvement initiatives as part of their culture and business strategy.

## Best Corporate Sustainability Report -

## Consumer Products (FSI)

Gildan received the Award for Best Corporate Sustainability Report - Consumer Products from the Finance and Sustainability Initiative (FSI). This annual competition aims to promote excellence in sustainable development reporting among Canadian public companies.

## 2017 Entrepreneurial Orchid Award for CSR

Gildan has been recognised by the Presidency of the Republic of Honduras and the Secretariat of Economic Development for its various community projects focused on strengthening education, improving child health and care services in the Northern Zone, and facilitating access to housing for its employees in 2015 and 2016.

## 2017 Ethibel EXCELLENCE Investment Register

Gildan has been selected for inclusion in the Ethibel EXCELLENCE Investment Register. This selection by Forum ETHIBEL indicates that the company performs better than average in its sector in terms of Corporate Social Responsibility (CSR).

## 2017 FUNDAHRSE CSR Seal

Gildan was once again a recipient of the FUNDAHRSE CSR Seal awarded by the Foundation for Corporate Social Responsibility in Honduras (FUNDAHRSE) for the 10th consecutive year. The CSR seal recognises Honduran companies that demonstrate leading practices related to corporate social responsibility, with Gildan being the only apparel company to receive this distinction 10 years in a row.



# ANTHEM®

It's the reason we don't pack garments individually or use unnecessary extras like swing tags. We take care to source packaging that's easy to recycle, like the plastic-free cardboard cartons with compostable shroud bags ensuring our products arrive in perfect condition. We practice this in the office too, making sure we recycle as much as we can to make our environmental footprint as light as possible.



## ETHICAL STANCE

At Anthem we pride ourselves on sourcing as ethically as possible.

All our fabrics conform to the OEKO-TEX® STANDARD 100. This means they have been safety tested by independent experts to prove they don't contain any banned or harmful chemicals. We make sure we do not use harmful dyes, colourants or substances during manufacturing, so our garments also comply with the EU general product safety directive. With full traceability, you have the peace of mind that none of our garments are derived from animals.

Social compliance is also a badge we wear with pride. We respect the labour principles in the amfori BSCI code of conduct and only select factories that recognise workers' rights, have high standards and reasonable working hours and conditions. The factory also have ambitious sustainability targets to reduce emissions, water, energy and waste. When you pull on an Anthem tee, you can be sure it has been created legally, through fair and honest practices, and without exploiting people or planet.

In the most recent economic climate there is nothing worse than wasting precious resources.



### Social Compliance Policy

A & R Textile Group B.V. is dedicated to ensuring that all employees are treated with humanity, dignity and all employees are entitled to his or her rights. The company strives to fulfil its responsibility by supporting the assurance of a socially responsible work environment.

### No Child Labor

Employees in the factories that produce for A & R Textile Group B.V. must be the minimum legal working age. A & R Textile Group B.V. strictly monitors this by regularly visiting the factory at unannounced times.

### No Slavery

A & R Textile Group B.V. is committed to ensuring there is no modern slavery or human trafficking in our supply chain, or any part of our business.

### No Discrimination

A & R Textile Group B.V. seeks to hire, retain, promote and otherwise treat all applicants and employees without regard to race, color, religion, age, sex, gender(identity), sexual preference, mental status, physical or mental disability, medical condition, pregnancy or any other characteristic protected by law.

### Wages

All employees are paid at least the minimum national or/and legal salaries in accordance to local or federal laws.

### Working Hours

Employee hours are set in accordance to local or federal laws. Overtime will be paid in accordance to local or federal laws. Employees are entitled to get the official vacation days off and also the national holidays.

### Harassment and Abuse

**A & R Textile Group B.V. does not tolerate any harassment or abuse in the organization.**

### Working Conditions

All employees are provided with a clean, safe and healthy work environment.

All factory employees have access to clean drinking water, clean storage area for lunches, free warm lunch, and adequate number of restrooms.

All machinery is maintained at a standard to ensure that workers are not at any unreasonable risk while operating the machinery.

First aid equipment is available in the factories and a person with basic first aid training.

Emergency exits are available on every floor of the factory.

### Environmental Sustainability

We strive to increase responsible stewardship on a daily basis, from materials sourcing to fabrication and throughout the supply chain.

For 2020 we have made a substantial progress towards changing the packaging materials from plastic to EPI. EPI is biodegradable material which degrades within approximately 12-14 months.

# ASQUITH & FOX®



## Ethical Statement

At Asquith & Fox® we uphold the highest ethical standards. All our garments conform to the OEKO-TEX® STANDARD 100. This gives you the confidence that they have been tested by independent experts and contain no banned or harmful chemicals on the restricted substance list of The European Union, Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulations or the ECHA SVHC Candidate List. They also comply with the EU general product safety directive and no harmful dyes, colourants or substances are used during their manufacture.

We also strive to reduce the environmental impact of our goods. The Asquith & Fox® Organic collection is made with certified organic cotton and garments are made from at least 80% organic, natural fibres.

Social compliance is high on our list of priorities and we respect and adhere to the labour principles in the amfori BSCI Code of Conduct. We take pride in selecting factories with high standards and decent working hours that protect and respect workers' rights. It's your reassurance that every garment has been produced legally, through fair and honest practices, and without exploiting the people who made them. With the additional promise that their working conditions and social performance will be enhanced through continuous

improvements.

## Plastic Use Statement

We need to protect our clothing on its journey from factory to end user, this means that a certain level of packaging is required to prevent soiling or damage during transit.

Our products are individually presented in plastic bags. The type of plastic used here is Low Density Polyethylene and, on the bags, you will see this recycling symbol.

Polyethylene can be melted to a liquid form and reshaped or extruded as it solidifies, making it reusable.

Recycling polyethylene not only helps the environment but can be another form of extra income. For more information about this, search on the web under "Buy my polyethylene plastic."

Whilst recognising that packaging is inevitable in our industry, we want to demonstrate how we've cut down on the materials used and improved the recyclability of these materials, so the environmental impact is kept to an absolute minimum.

As a brand we have reduced and removed where we can any unnecessary packaging throughout our supply chain and carry this ethos forward into our daily working lives. In our head office we have recycling points for toner cartridges, cardboard, paper and polyethylene plastic. We are also trialling the use of biodegradable bags for our organic styles and plan going forward to use biodegradable packaging when sending any samples.



AWDiS (Just Hoods by AWDiS, Just Cool by AWDiS, Just Ts by AWDiS, Just Polos by AWDiS, Just Sub by AWDiS, So Denim by AWDiS, Ecologie by AWDiS, AWDiS Academy) will only do business with vendors and suppliers that share the company's adherence to high legal, ethical and moral standards. AWDiS' goal is to create and encourage creation of model operations that provide good jobs at fair wages and also improve conditions in their communities.

All suppliers, vendors and other business partners are expected to comply with AWDiS Operating Principles and to assure compliance in all contracting, subcontracting or other relationships. In establishing these guidelines, AWDiS believes it is effectively exercising its economic leverage with business partners to encourage their full compliance with laws designed to protect their employees and support the highest standards of business conduct.

The following guidelines have been developed to ensure consistent compliance by all suppliers and vendors. AWDiS recognise that the Guidelines will also assist management in selecting business partners and follow work place standards and practices consistent with AWDiS Operating Principles.

## OPERATING PRINCIPLES

### No Child Labour

AWDiS will not do business with vendors and suppliers that use child labour. AWDiS will not use vendors and suppliers who employ people in violation of local mandatory school age or under the legal employment age in each country. If AWDiS deems that the work being done is inappropriate, or poses possible risk to employees at the legal minimum employment age, it reserves the right to establish its own minimum age limit for vendors and suppliers on a country by country basis. Under no circumstances will the minimum age be under 15. Children and young persons under the age of 18 shall not be employed at night or in hazardous conditions. The policies and procedures shall conform to the relevant International Labour Organisation (ILO) policies. AWDiS supports the development of legitimate workplace apprenticeship programs for the educational benefits of younger people.

### Employment Is Freely Chosen

There shall be no forced, bonded or involuntary prison labour. Workers must not be required to lodge 'deposits' or their identity papers on commencement of employment. Workers must be free to leave their employer after reasonable notice.

### Freedom of Association and Employee Representation

Suppliers should respect the rights of employees to join or form an association of their choosing (such as workers council, union, or workers association). Where the right to freedom of association and collective bargaining is restricted by law, the employer should facilitate, and not hinder, the development of parallel means for independent and free association and bargaining. Representatives must not be discriminated against and have access to carry out their representative function in the workplace.

### No Discrimination

While AWDiS recognises and respects cultural differences, the company believes that there should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, union or political membership. In-country laws, however, will take precedent over company policies and directions.

### Wages and Benefits of Employment

Wages and benefits paid for a standard working week must meet, as a minimum, national legal requirements or industry benchmark standards, whichever is higher. Wages should cover the need to meet both basic needs and some discretionary income. All workers should be provided with written and understandable information about their employment conditions and wages before employment and provided with wage slips for each period they are paid. Deductions from wages as a disciplinary measure is not permitted other than those required by law. Any such deductions must not be taken without the expressed permission of the worker concerned.

### Hours of Work and Regular Employment

All factories must adhere to relevant national laws with regards to maximum working hours as standard.

To every extent possible work performed should be on the basis of a recognized employment relationship. Obligations to employees under labour or social security laws and regulations should not be avoided through the use of home working schemes, subcontracting or apprenticeships where there is no intent to provide regular employment.

The conditions for the termination of a contract should be laid out before employment commences and conform to established and transparent company practices and local law.





## Discipline

Employee abuse in physical, sexual or verbal form of intimidation is not acceptable and prohibited.

## Health and Safety

A safe, clean and hygienic environment should be provided, taking into account the specific hazards of the industry. Adequate steps should be taken to prevent accidents and injury to health at work. Workers should receive regular and recorded health and safety training. All workers should have access to clean toilet facilities and drinking water. Where provided accommodation should be clean, safe and meet the basic needs of workers. A senior manager should be appointed as the Health and Safety representative for the company.

## Environment

AWDiS will only use those vendors and suppliers who share the company's commitment to the community and to the environment. They must conform to all legal requirements regarding environmental codes and guidelines. Furthermore, AWDiS will seek business partners who demonstrate a commitment to progressive environmental practices and to protecting the earth's resources.

All products supplied must conform to all European Union environmental legislation.

## Customs Compliance

Facilities will comply with applicable customs laws, and in particular, will establish and maintain

programs to comply with customs laws regarding illegal trans-shipment of finished products.

## Security

Facilities will maintain facility security procedures to guard against the introduction of non-manifested cargo into outbound shipments (i.e. drugs, explosive biohazards and/or other contraband).

## Right of Inspection

AWDiS will assure proper implementation of and compliance with standards set forth in these Guidelines by implementing affirmative measures such as on-site inspection of vendors' and suppliers' facilities.

## Animal Testing

AWDiS and its business partners do not condone the testing on animals at any stage of manufacturing for its products or packaging.

## Anti-Corruption

No employee of AWDiS or any of its approved business partners may, directly or indirectly through one or more intermediaries, give, offer or agree to give or offer, a bribe or kickback to any person. Prohibited payments include the payment of anything of value (in the form of money, gifts, loans, rewards, travel or business opportunities, advantage or benefit of any kind) to or for the benefit of any foreign official, domestic official or person doing business in the private sector for the purpose of inducing or rewarding favourable action (or withholding of action) or the exercise of influence by such individual.

## REACH Policy

REACH is a European Union regulation concerning the Registration, Evaluation, Authorisation and

restriction of Chemicals. It came into force on 1st June 2007 and replaced a number of European Directives and Regulations with a single system. Hazardous chemicals are defined as Substances of Very High Concern (SVHC's). <http://echa.europa.eu/candidate-list-table>

While our products do not currently fall within the scope of REACH's registration requirement and do not contain any chemicals defined as SVHC's or Azo-Dyes, we continue to monitor the EU regulation for changes that may require our attention.

AWDiS is fully supportive of the various industry efforts throughout the world to phase out the use of undesirable elements from manufacturing processes. AWDiS remains committed to continually reducing its impact on the world's natural environment, and we work closely with our customers and suppliers to identify and rapidly eliminate hazardous substances from our products.

## Cotton Pledge

We are aware of reports documenting the use of forced child and adult labour in the harvesting of cotton from Uzbekistan. We firmly oppose the use of forced labour of any kind in the sourcing of our raw materials. Until the situation changes and is verified by the International Labour Organisation (ILO) we commit to not sourcing any cotton for the manufacturing of our products from Uzbekistan.



## SUMMARY: GOALS & ACHIEVEMENTS 2017

At The Cotton Group we continuously commit ourselves to make a positive impact on our environment. We believe that sustainability and corporate responsibility deliver added value to our customers, employees and business partners, throughout our whole value chain. The same vision that drives our business strategy, drives our commitment to social and environmental sustainability. That's why we encourage every employee to play a part in making sustainability a reality. Our sustainability engagement is incorporated into our organisation and our goals and objectives. For several years now, The Cotton group is member of the Fair Wear Foundation. In 2008 as part of Kwintet, in 2015 as part of the Fristads Kansas group and since 2017 independently. Besides FWF, all our suppliers have received, acknowledged and embraced The Fristads Kansas Group code of conduct. Our suppliers have also been audited by other organisations, such as BSCI and Accord. TCG has not signed for Accord but we do select suppliers who are part of the Accord remediation. During 2017 we have been focussing on every step in our supply chain to support our suppliers to be more efficient and to adhere to our social and environmental engagement. We try to give our suppliers a better and more evenly spread planning, so they can be more efficient and can

plan their production better and don't need to do unnecessary overtime or need to sub-contract. Most of our suppliers have a big capacity and vertical set-up (all processes in-house), for that reason we don't really need to sub contract our production. We have created a full-time position in our Bangladesh office, to take care of all CSR related responsibilities and to be a liaison with all our suppliers. We reiterated this year, to all suppliers, our FWF membership and its Code of Labour practices. On top of that we explained the importance of continuously improving working conditions. As an example, we implemented in 2017 a Code Red process which will alert Top management (CEO and board level included) about Zero Tolerance Issues.

## 1. Sourcing strategy

### 1.1. Sourcing strategy & pricing

The Cotton group and its brand B&C are specialized in promotional wear. We develop and sell through our yearly catalogue, to European wholesalers, a wide range of products that are meant to be embellished (job done in Europe) for different kind of purposes (promotion, hospitality, tourism, workwear, corporate, etc). The range of products is mainly composed of:

- Tee-Shirts
- Polo shirts
- Sweatshirts
- Shirts
- Polar Fleece
- Jackets
- Accessories

Unlike common retailers, once a B&C style is developed, it is kept in the collection and catalogue for many years. Key characteristics for B&C are: Consistency in colours, and perfect printability and competitive prices. All brands in promotional market ( and there are many) are releasing a yearly price list and prices are normally fixed for a whole year.

B&C has been on the European market for over 20 years and has always been sourcing its product from Asia. Main sourcing countries as of end of 2017 are:

- Bangladesh 94%
- Pakistan 4%
- China 2%

B&C sourcing strategy has always been to maintain a long-term relationships with its suppliers. Besides that we continuously look for new opportunities and try to identify new suppliers if and where needed.

B&C core suppliers (90% of our volumes in 2017) have been our partners for over 10 years and some even since the start of the B&C brand.

### 1.2. Organisation of the sourcing department

B&C Sourcing is integrated within Operations department in Waterloo Headquarters

Our sourcing department, based in Belgium, has the full support of the Dhaka Liaison Office (DLO) in managing the active supplier base as well as actively looking for new opportunities.

B&C places orders on a monthly basis. Planning and Sourcing department are working hand to hand during the order placement to allocate the quantities to suppliers with whom we have booked capacities and/or negotiated prices within a specific time frame.

### 1.3. Production cycle

As mentioned above, B&C styles are sold over a quite long-time frame. Our best-selling products have been in the market for several years. The shortest life cycle of a product would be 3 to 4 years depending on sales performance.

Our product Managers are in charge of analysing the market and spot styles/colours/sizes to be launched for the years to come.

Our active suppliers produce the same Fabric/ Colour/Styles every month and we thrive to



provide them some forecast and/or book capacities to them to keep the production flow smoothly.

#### 1.4. Supplier Relations

As mentioned, B&C can't start working with a factory if it does not comply with CSR practices and our Code of Conduct.

At sourcing stage, we ask prospective factories to provide us and our Regional Compliance Manager in Dhaka all CSR audits available (BSCI, WRAP, SEDEX, etc) together with running CAP's.

We also ask for ACCORD audit status together with all ongoing remediation points.

#### 1.5. Integration monitoring activities and sourcing decisions

To become a B&C supplier, factories must comply with our requirements in terms of CSR, quality standards and price. If any of those 3 parameters fail we do not start any developments. What is the B&C sourcing procedure?

- Contact new factories by email (found by recommendation, factory approach or pure sourcing)
- Review full factory profile (compliance, production integration, machines, capacities, skills)
- Review of B&C sourcing needs versus factory core products.
- Spot selected B&C styles for price review and check if prices are workable.

- Group Regional Compliance Manager to visit the factory for first CSR assessment. (Complete assessment process can be found in chapter 2)
- If CSR assessment is positive, the Sourcing Manager & DLO will visit the factory.
  - Review of their profile.
  - Review of their existing buyers.
  - Review on B&C Process.
  - Product development process.
  - Quality approval process.
  - Prices & payment terms.
- Fabric/Color/Style development can start.
- Once everything is approved we place a test order.
- If test order is successful, we can consider the supplier as fully active for B&C.

It could happen that after a successful test order we should re-consider the relationship with a supplier because of CSR malpractices. Our Dhaka office and Regional Compliance Manager for CSR are monitoring each factory on a regular base. They report to the Belgian HQ on a monthly basis on all CSR project/issues/processes we may face with our suppliers.

#### 2. Coherent system for monitoring and remediation

All factories are regularly visited by the head Office teams and Dhaka office. They systematically review if there is any non-compliance with our Code of Conduct. Remarks refer, for example, to child labour, health and safety standard on the factory floors, such as blocked fire exits and further. Any deviation is immediately reported to the Group CSR team and if needed an escalation process will be executed.

Depending on the purpose of the visit, compliance is reviewed. Remaining Non Compliance issues that have to be remediation will be detailed in an agreed frame. (CAP)

Compliance auditor's visits always include in-depth discussions with the management regarding Code

of Conduct implementation, corrective action plans that the management has to sign off, and how the factory management intends to maintain good working conditions in the factory.

As Red graded issues are prioritized and must be addressed immediately, a Code Red process has been implemented this year involving sourcing/ product development/ supply chain reporting even up to CEO and board level.

New suppliers submit all CSR related documents to the Group Regional Compliance Manager and HQ. After review and positive result, an inspection visit will follow. Only after being Green rated, B&C can continue to build relationship and start up potential developments and production.

- We check other certifications (WRAP, BSCI, SEDEX, OEKO-TEX, GOTS, ISO etc.)
- Are factories involved with any type of CSR related projects?
- Do factories have a vertical (preferred) set up?
- Are factories working with or engaged with NGO's or working on environmental projects? (O discharge, ETP)
- Factories with green project plans or already implementing these plans will have priority.

#### 2.1. Bangladesh

The majority of factories are based in Bangladesh (94% of the production). We believe in continuous monitoring processes to achieve immediate and lasting improvements. Monitoring process is the same for all factories.

- Monthly review of factory remediation and progress with supplier's management through "Factory Follow-up" chart prepared for the group.
- To identify the non-compliant issues as per Company Code Of Conduct, physical visits to factories, 3rd party audit (BSCI, SEDEX etc.) and implement remediation action.
- Conduct periodic internal reviews or audits to



ensure that compliance procedures are followed.

- Collaboration between B&C management and supplier's management to ensure the implementation of consistent disciplinary action strategies in case of compliance standard violations.
- Develop and implement improvements on communication, monitoring, or enforcement of compliance standards.
- If required we do our internal audit as per our Code Of Conduct (new supplier start up, extra follow up)
- Escalation implementation with supplier's management in case of non-remediation.

Results of monitoring are various. A summary of general common outcomes

- Social Management System => Training is provided to create awareness about law, policies, health & safety.
- Working hour=> Control excessive working hour.
- Occupational Health and Safety => PPE's provided but training of use to be given.
- Grievance Mechanism => Create more awareness about this process.
- Environmental Part => Keep creating awareness to protect our environment and to reduce pollution.

Positive improvements on continuous monitoring:

- We are getting continued progress from the factories regarding social compliance.
- Factory workers are much more aware about their rights and benefits.
- Factories have improved in areas of health & hygiene, building safety, electric safety, fire safety.
- Workers are becoming educated about labour law, policies, safety issues.
- Factory work places are improving continuously.
- Improvements on environmental and sustainability areas.

Corrective action plan we follow:

- Review of the audit report.
- Follow up meeting with factories about remediation plan through the FWF, BSCI and ACCORD platforms.
- Detailed follow up meeting with factory management regarding audit finding and solution as per given timeline on corrective action plan.
- Conduct monthly psychical visits by compliance team each month to check upon correction on CAP's.
- After completion of the correction on CAP's organize follow up audit.
- Besides social compliance audit follow-up, we follow up ACCORD CAP's on monthly basis and attend ACCORD meeting regarding improvement and remediation of supplier's factory.

We support factories on remediation as per below:

- Factory capacity building activities according to audit rating and classification. As an example we can help our suppliers to pre-finance investments that are needed to build the needed capacity.
- Factory incentive to participate to BSCI

workshops and e-learning sessions.

- Factory audit schedule (fully/ semi and unannounced).

## 2.2. Other countries (China and Pakistan)

Besides Bangladesh B&C has production in China and Pakistan. The above mentioned exercise (2.1 Bangladesh) is similar to China and Pakistan.

## 3. Complaints handling

All complaints will be taken serious and will be delt with immediately. Actions will be taken from the Dhaka office with support of HQ. In 2017 we did not receive any complaints.

- Start communication with the relevant factory.
- Communicate with the relevant worker.
- We keep record of the complaint.
- We take acknowledgement from the complaint owner.
- Investigate the complaint, if necessary with an NGO/3rd party.
- Follow up on the investigation and act when needed.
- Resolve the complaint, find solution.
- Follow up and finalize.

In 2017 we started to advised the factory management on our appointed FWF auditing list to raise awareness about FWF and it's complaint mechanism to the factory workers :

- Providing guidance to the factory on the process of remediation.
- Providing necessary training to the workers about FWF complaint mechanism.
- FWF sticker with the local complaint handlers contact number is also distributed by us.
- FWF helpline number is provided.
- We communicate and follow op with FWF representative regarding the status of the



submitted complaint.

- Complaint forms are present at factories to submit a complaint (complaint box, register, etc)

#### 4. FWF training

4.1. Activities to inform staff members about FWF  
We developed activities to inform and to train our staff about FWF membership:

- In person training through department meetings.
- Providing FWF website address.
- Providing FWF brochure.
- Fair Wear Foundation is also visible on our website and in the catalogue.

#### 4.2. Activities to inform agents about FWF

Below initiatives are taken to inform and train our agents:

- Provide our agents the FWF COC, Code of Labour Practice and other documents received from FWF.
- Provide internal training from the brand to the agent to introduce FWF.
- Invite our agents to the training organized by FWF for B&C suppliers.

#### 4.3. Activities to inform manufacturers and workers

To introduce FWF to factory workers we have asked the factory management to take below

steps:

- Provide training to the workers by the factory management.
- Provide FWF leaflet and stickers.
- Organize training through FWF for the worker's representatives to create awareness about FWF's roles and responsibilities.

Future initiatives:

- Work on workplace safety improvement project.
- Attend various training by NGO's or social organization regarding labour law and other relevant area.
- Give internal workshop in factory.
- Give labour rights training.
- Organize Awareness Training for Pregnant workers and review maternity benefits.
- Review capacity of factories.
- Living wages analysis.
- Awareness training on environmental part.

#### 5. Information management

We keep track on the progress of implementing the code of labour practice in our own database.

- Information will be shared from suppliers to the Group Regional Compliance Manager.
- Every progress on implementation or CAP's will be updated.
- Information will be shared with stakeholders on Monthly base.

To monitor all our production locations (incl. Subcontractors) we keep our own tracking system.

- We collect all necessary compliance certifications to be sure about production location's compliancy.
- Our supply chain maintains all required

information and keep track in our database.

- We collect all necessary information before the production.
- We review and keep all audit report properly.
- We do risk assessment as per our internal process.
- For sub-contractors we visit them prior to production. We also make assessment and provide them remediation plan for corrective action (if needed). Beside this we closely monitor with the mother company of the sub-contractor to ensure they apply an internal audit.

#### 6. Transparency & communication

The general public is informed about The Cotton's Group FWF membership via our website as well as FWF's website. We also communicate on FWF to customers in our catalogue and during customer visits and meetings.

Our Compliance Manager and Quality Manager communicate throughout the year with our suppliers and our customers (through customer service and sales team) about compliance, social responsibility, sustainability and FWF.

#### 7. Stakeholders engagement

2017 stakeholders involved in our CSR activities:

- Local Dhaka Liaison Office of The Cotton Group in Bangladesh.
- CSR Group Manager of the holding Fristads Kansas Group based in Hong Kong.
- FWF staff (main source of information on specific countries laws and regulations)





amfori  BSCI  
Trade with purpose



### Code of conduct

We appreciate everyone who contributes to making our clothing and we ensure that they work in fair conditions for a fair wage, and in an ethical and sustainable manner. We are BSCI compliant or equivalent. Our code of conduct is a shared commitment between us and our partner suppliers and factories, and is a set of standards that we live by.

### WHAT WE INSIST ON:

We work with only reputable manufacturers; each with a clear ethical and social policy with relevant and recognised certifications that are in line with our own Well Made ethos and Code of Conduct.

We only work with mills that have a suitable and effective effluent treatment plant (ETP) to ensure that the water used in the wet processing/ dyeing stages of our production processes is safe to be put back into the environment.

In order to ensure that our garments are kind to skin and with no potentially harmful dyes or chemicals used during manufacture, we insist that all our fabrics are certified to OEKO-TEX® Standard 100, with all babywear fabric holding class 1 certification.

We ensure we know where the cotton used in the manufacture of all Mantis World garments

comes from, and, in keeping with our ethical policy regarding the use of child or forced labour, continue our pledge not to use Uzbek cotton.

- No child labour
- No forced labour
- No physical disciplinary measures
- No discrimination of any kind
- Fair wages, reasonable working hours and overtime pay in accordance with local legislation
- Freedom of association and rights to collective bargaining
- Paid Maternity leave
- A clean, healthy and safe work environment
- On-site health clinics or a first-aid centre
- A policy of social accountability
- Anti-Bribery policy
- Anti-Corruption policy

Protection and preservation of the local environment including:

- Consideration of scarce resources
- Careful waste management
- Policy to reduce, reuse and recycle
- Effluent Treatment Plants to ensure clean water is returned to local water systems.

Every country is different and each of our manufacturing partners provides different benefits depending on local needs. These can range from:

- Free or subsidised meals
- Free standard medication and health education
- On-site childcare facilities
- Food assistance for employees' families
- Support of local community groups.

Use of Plastic:

In our attempt to cut down on our use of virgin plastic, we are switching all polyester in our garments to recycled plastic (rPET), in an attempt to be more circular in our production. We are continuously working to implement more sustainable practices throughout our supply chain, manufacturing, transport and packaging, for example all of our polybags are now 100% recycled and 100% recyclable.

**Beechfield**<sup>®</sup> **BagBase**<sup>®</sup>  
ORIGINAL HEADWEAR

QUADRA

Westford  
Mill

amfori  BSCI



## Ethical Statement

BeechfieldBrands Ltd. are firmly committed to offering great value quality products, but not at the expense of any individual in the supply chain, nor at the expense of the environment. Protecting the environment and championing safe and fair working practices is very important to us. Ensuring our partners meet and exceed local environmental laws is a key priority to support us in our journey to reduce waste and minimise our environmental impact across all our operations.

## What do they mean?

BeechfieldBrands Ltd. demonstrates its commitment to humane working conditions by conducting biennial CSR audits. We strive for the highest standard of behaviour towards everyone we work with and the environment on which we have an impact.

The Fairtrade Organisation set social, economic and environmental standards for both companies and the farmers and workers who grow cotton and other commodities. For farmers and workers, the standards include protection of workers' rights and

the environment. For companies they include the payment of the Fairtrade Minimum Price and an additional Fairtrade Premium to invest in business or community projects of the community's choice.

Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) addresses the production and use of chemical substances, and their impact on human health and the environment. BeechfieldBrands Ltd. is committed to ensuring that no Substances of Very High Concern (SVHC) are used in the production of its products thus safeguarding those involved manufacturing, customers and ultimately the environment.

Organic 100 Content Standard - Made with cotton that was bought at a price that allows cotton producers in developing countries to sustainably invest in their businesses and communities.

BeechfieldBrands Ltd. have achieved EN812 certification for a range of Bump caps. These CE marked products conform to all the legal requirements specified in the EN812 standard.

1% for the Planet is a global movement inspiring businesses and individuals to support environmental solutions. Members provide financial donations, volunteer time and other shared-value collaborations.

# BELLA+CANVAS®



## Ethical Statement

Since the beginning, part of our BELLA+CANVAS mission has been to be conscious of our impact on the environment. We aren't naive to the fact that historically, the clothing industry has negatively impacted Earth. With that said, from the start, we've been out to, well, as our motto says, BE DIFFERENT. And that difference starts at the beginning of our production process and remains a top priority all the way through to the lifestyle we encourage our employees to live and the high-quality t-shirts we produce. We believe in being an eco-friendly clothing company. This post gives a glimpse into some of the decisions we've made to reduce our ecological footprint while creating a leading clothing brand.

## Water Reduction

We dye all of our fabric in California at dye houses that use 7x less water than the average clothing manufacturer.

California has some of the most strict EPA (Environmental Protection Agency) regulations, so by dyeing in California, we are adhering to the highest level of environmental compliance for our men's t-shirts and women's t-shirts. At our dye houses, everything is monitored to eliminate waste. We are also utilizing the most efficient machines that are available, which allow us to use seven times less water than the average clothing

manufacturer. We use three gallons of water per pound of fabric, whereas, most others use anywhere from nine to 20 gallons of water per pound of fabric. During an average week, we save approximately 24 million gallons of water. This top-notch technology uses a very low level of dye-per-water ratio, which is monitored through a digital computer system. When dye houses mix manually, they'll generally use extra dye, which causes inconsistency and wastefulness. The dyes we use are also bluesign® certified, which guarantees they are eco-friendly. Once a process is complete, the water and dyes are separated. The water is recycled through an in-house filtration system and reused again, rather than being dumped into rivers or oceans. The dye waste is also burned at a high temperature in a self-contained environment, allowing for no smoke stacks or pollution to be put into the air.

## Energy Reduction

We take every opportunity to reduce our CO2 emissions.

Our sewing and cutting facilities are run on solar power. And by the end of 2019, we'll have a 450,000 square foot solar farm to further our commitment to clean energy. All the buildings at our headquarters are equipped with motion-sensor LED lighting, which use nine times less energy than traditional lights. We are constantly updating our employees' computer monitors to new ones that use less power. The skylights in the buildings also help offset the amount of power needed, and we continue to expand the number of them throughout our campus. All the buildings are insulated in a way that allows for minimal artificial heating and cooling. For years, our employee parking lots have had electric car charging stations to encourage employees to live a green lifestyle even after they leave the office.

## Virtually Zero Waste

We recycle everything possible – fabric, plastic, bottles, paper... you name it!

As we've mentioned above, we believe that taking advantage of and incorporating the latest technology will help us reduce our carbon footprint. Our systems are very high-tech, and all orders are processed digitally, with minimal paper waste involved. Our goal is to soon have a completely paper-free warehouse – and we're close to that! We have only one trash can in each building, so employees take part in sorting and recycling all waste. We also don't let any fabric go to waste. Anything that isn't turned into a BELLA+CANVAS product, is picked up daily and taken to different recycling centers. The fabric is then recycled into different things like tile, bottles, stuffing, upholstery – even energy!

As technology advances so will our eco-friendly practices. Our goal is to make the best tees around while still putting Earth first. We invite you to join our movement. BE DIFFERENT. Choose BELLA+CANVAS.

# BROOK TAVERNER

SINCE 1912



## Ethical Statement

Brook Taverner Ltd follows the labour standards recommended by the Ethical Trading Initiative & adheres to the principles of the ETI base code.

The Labour standards are based on the Conventions of the International Labour Organisation and the Universal Declaration of Human Rights.

## 1 Employment is freely chosen

1.1

There is no forced, bonded or involuntary prison labour.

1.2

Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

2

There is no discrimination in employment

2.1

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

## 3 No exploitation of child labour

3.1

There shall be no recruitment of child labour.

4 Freedom of association and the right to collective bargaining

4.1

Workers have the right to join or form trade unions of their own choosing and to bargain collectively.

4.2

Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

4.3

Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

## 5 Payment of a living wage

5.1

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2

All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3

Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions

from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

## 6 No excessive working hours

6.1

Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

6.2

In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

## 7 Decent working conditions

7.1

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

7.2

Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

7.3

Access to clean toilet facilities and to potable water, and if appropriate sanitary facilities for food storage

shall be provided.

7.4

Accommodation, where provided, shall be clean,

# BROOK TAVERNER

SINCE 1912

safe, and meet the basic needs of the workers.  
7.5

The company observing the code shall assign responsibility for health and safety to a senior management representative.

## 8 Regular employment must be provided

8.1

To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

## 9 No Harsh or inhumane treatment is allowed

9.1

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

## 10 Fire safety

10.1

Comprehensive fire safety evacuation and management plans are in place, particularly for factories located in multi-floored environments.

10.2

Storage of flammable materials, such as chemicals or textiles, in high risk areas, such as production areas or near generators, is strictly prohibited.

10.3

Fire drills are conducted regularly and adhere to established local government standards.

## 11 Anti – Bribery

11.1

Brook Taverner Limited values its reputation for ethical behaviour and for financial probity and reliability.

It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery.

This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the UK Bribery Act 2010. The Company is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas.

Brook Taverner Ltd will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person acting on the behalf of Senior Management.

11.2

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with:

The intention of inducing or rewarding improper performance of a function or activity; or

Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith or in accordance with a position of trust.

I can confirm that all the garments produced on behalf of Brook Taverner Ltd are manufactured in accordance with the above ethical policy requirements.

## 12 Modern Slavery

Brook Taverner is committed to ensuring there is no modern slavery or human trafficking in our supply chain, or any part of our business.

All Brook Taverner suppliers comply with the 2015 Modern Slavery Act where applicable.

We only work with suppliers who adhere to the principles set out in our ethical sourcing policy, prior to commencing business. Our sourcing policy contains our ethical codes of conduct, aligned to the ETI base code. This includes, among other requirements, conditions whereby factories producing our goods must ensure that employment is freely chosen, child labour shall not be used, and no harsh or inhumane treatment will occur.





## Ethical Statement

Behavioural Codex of TB International GmbH for trading and non-trading commodities

We, TB International GmbH, believe in social engagement, environmental commitment and fair cooperation as the major pillars of our society. The aim of TB International GmbH is to bring economical, environmental and social responsibility into accordance. The fundamental requirements of TB International GmbH on their suppliers are regulated in this behavioural codex. The principles laid down are among others in accordance with "Business Social Compliance Initiative" (BSCI), the conventions of International Labour Organisation (hereafter referred to as "ILO"), the UN Universal Declaration of Human Rights, the UN Committee on the Rights of the Child, the elimination of all forms of discrimination against women, the principles of the UN Global Compact as well as the OECD Guidelines for Multinational Enterprises.

The principles stated in this behavioural codex are not to be seen as our highest goals, but rather as ones to be exceeded wherever possible.

### 1. Area of Validity

This behavioural codex forms the basis for all business relationships with regard to all national and international production processes and sites regarding the final stage of production (hereafter "Production Sites") for all trading and non-trading commodities procured by TB International GmbH. It is valid for TB International GmbH over the

whole world as well as for direct business partners of TB International GmbH, and also for any other agents commissioned by said direct business partners who are involved in the manufacturing of goods for TB International GmbH (hereafter jointly referred to as "Business Partners"). The business partners guarantee and vouch for the fact that they will adhere to and/or grant the principles laid down in this behavioural codex.

### 2. Observance of Laws

In the respective production sites the valid national and international laws and ordinances, minimum industrial standards, ILO and UN conventions as well as all other relevant stipulations (hereafter referred to as "Norms") are to be observed, whereby those norms that represent the strictest requirements are to be applied. The observance of this behavioural codex and the above norms may not be circumvented by any stipulations in employment contracts or comparable measures (e.g. pseudo-training programmes).

### 3. Child Labour/Employment of Adolescents

Child labour and any form of exploitation of children and adolescents will not be tolerated by TB International GmbH. The minimum age for working authorisations may not be below that age at which compulsory education ends and under no circumstances be below the age of 15. Inter-state norms for the protection of children and adolescent employees are to be observed. The exceptions of the ILO do apply. The observance of the ban on child labour and the restriction of the employment of adolescents is to be guaranteed. In particular, adolescents may not be subjected to any situations that are dangerous, unsafe or hazardous to health. In the event of a violation of this ban the business partner is to introduce appropriate remedial actions immediately. The remedial actions are to be documented. Moreover, such measures and procedures are to be taken that serve the purposes of the rehabilitation and social integration of the children concerned and to enable them to acquire a general school-leaving certificate in accordance with inter-state norms.

In accordance with the ILO conventions 79,138,142 and 182, as well as the ILO recommendation 146.

### 4. Discrimination

Any form of discrimination in connection with appointment and employment is forbidden. In particular all forms of differentiation, exclusion or preference that are based on the race, social caste, colour of the skin, gender, age, religious beliefs, political opinion, membership in a workers' organisation, physical or mental handicap, ethical, national and social origin, nationality, sexual orientation or any other personal characteristics are forbidden. This applies independent of whether said differentiation, exclusion or preference was decided upon by the business partner or not. In accordance with the ILO conventions 100, 111, 143, 158 and 159.

### 5. Right of Association and Right to Free Collective Bargaining

The employees are to be protected against all forms of differential treatment that are connected with their employment and are targeted against the freedom of assembly. Their right to found associations or organisations of their own choosing for the purpose of promoting and protecting the interests of employees, to join or resign from said organisations as well as to work for them is to be respected. The practice of their professions must not be impaired as a consequence thereof. In the event that any inter-state norms should restrict the right of association and the right to free collective bargaining then, as an alternative, the free and independent association of employees for the purpose of conducting negotiations must be made possible and granted as a minimum standard. In accordance with the ILO conventions 87, 98, 135 and 154 as well as the ILO recommendation 143.

### 6. Forced Labour

All forms of forced and compulsory labour, debt bondage, serfdom or slave labour as well as any

conditions similar to those of slavery will not be tolerated by TB International GmbH. All forms of prison labour are rejected. No employee may be directly or indirectly compelled to work by means of violence or intimidation. Employees may only be deployed if they have voluntarily come forward for the tasks in question.

In accordance with the ILO conventions 29 and 105.

## **7. Disciplinary Measures**

All employees are to be treated with dignity and respect. Sanctions, fines, and any other forms of punishment or disciplinary measures may only be imposed in accordance with valid national and international norms as well as with the internationally recognised human rights. No employee may be subjected to verbal, psychological, physical, sexual and/or bodily violence, coercion or harassment.

## **8. Working Hours**

Working hours must be in accordance with valid legislation, industrial standards or relevant ILO conventions, whichever is the stricter regulation. The maximum permissible number of working hours per week according to the national laws shall apply, but this may not, on a regular basis, exceed 48 hours or 60 hours including extra work. Moreover the relevant national and international norms, and in particular the exceptions of the ILO, shall apply to individual trades and types of employment contracts as well as in cases

of serious disturbances to regular company operations. The employees are entitled to at least one day off after six consecutive working days. Any extra work performed is to be rewarded separately in accordance with inter-state norms. Extra work must be performed on a voluntary basis. In accordance with the ILO conventions 1 and 14.

## **9. Documentation of the Working Relationship**

The business partners guarantee the written documentation of the working conditions (e.g. beginning and duration of the working relationship, number of working hours, wages and bonuses) of their workforce in relation to those manufacturing phases that directly affect them. The name, date and place of birth and, if at all possible, the address of the employee should be registered. The direct business partners furthermore guarantee an equivalent documentation on the part of any agents employed by them. Any circumvention of valid inter-state labour and social insurance norms is banned.

## **10. Remuneration**

The business partners guarantee that the wages paid to the employees corresponds at the very least to the minimum wage prescribed either by law or the normal standards of the branch of industry in question, whichever is the higher. The wages paid should be sufficient to cover the employees' basic needs. Illegal and unjustified wage deductions, in particular such that take the form of direct or indirect disciplinary measures, are forbidden. The wages must be paid to the employees in a form that is practicable for the latter (e.g. in cash or by cheque). The employees are to be informed regularly and in detail as to how their remuneration is made up. In accordance with the ILO conventions 26 and 131.

## **11. Health & Safety**

The business partners are required to ensure a

safe and healthy working environment. They will undertake those measures necessary to avoid accidents and damage to health that could arise in connection with their activities. To this end the business partners will set up systems for the detecting and averting of potential threats to the health and safety of their employees or to respond to such threats. They will furthermore guarantee that the employees are regularly informed about and trained in health and safety norms, as well as safety measures. The business partner is required to document the above.

Clean toilets and access to adequate quantities of drinking water must be provided. Inasmuch as bedrooms are also provided, these must be clean and safe and conform to health requirements. In accordance with the ILO convention 155.

## **12. Environmental Protection**

The protection of nature and the environment is an integral part of the business practice of TB International GmbH. The business partners are required to observe the environmental standards. They are furthermore required to work continuously on the avoidance and reduction of burdens on the environment. Valid procedures and standards for waste management, handling of chemicals and other hazardous substances and the disposal thereof, as well as for emissions and the treatment of waste water are to be observed. The protection and preservation of the natural resources of life are to be taken into particular account and an environmentally and socially compatible method of production should be promoted.

## **13. Bribery and Corruption**

No form of bribery or corruption will be tolerated by TB International GmbH. All business partners and employees must conduct themselves in such a fashion that no personal dependencies, obligations or influences can arise. It is expected of everyone that he/she will go about his/her business in a manner compatible with the principles of fairness

and the observation of the valid national and international norms.

The business partners will also introduce an anti-bribery and anti-corruption policy that is to be observed in all fields of business activity. Inasmuch as, in certain nations, presents are a matter of custom and politeness, care should be taken that these do not lead to any obligating dependencies and that the valid norms of the law of the country in question are adhered to.

Any indications of corrupt behaviour should be reported to TB International GmbH (Divisions: Company Auditing or Company Investigations) or to the independent external ombudsman (cf. Figure 18).

#### **14. Management Systems**

The business partners shall introduce a management system for the purpose of the realisation, observance and monitoring of the principles set down in this behavioural codex. The management system must contain clearly defined responsibilities and procedures as well as adequate documentation. The documentation, realisation, upholding and continuous improvement of the principles set down in this behavioural codex need to be reviewed regularly. These reviews are to be documented. The direct business partners shall ensure that any other agents deployed by them adhere to the principles set down in this behavioural codex.

#### **15. Monitoring of the Behavioural Codex**

It is the responsibility of TB International GmbH to vouch for the guaranteeing of the principles of this behavioural codex. To this end the business partners are, if required to do so by TB International GmbH, obliged to have a social audit implemented at their production sites.

The direct business partners guarantee that TB International GmbH itself or, if necessary, any third parties authorised by it may be allowed to carry out a review of the observation of the principles set down in this behavioural codex on the premises of either the immediate agent itself or on those of any other sub-agents deployed by it. It will name its production sites for this purpose accordingly.

#### **16. Sanctions and Remedial Actions**

TB International GmbH is entitled to monitor the principles defined in this behavioural codex. Inasmuch as any non-observance is established, the business partner is obliged to introduce appropriate remedial actions without delay. TB International GmbH will provide both sufficient time and support for said remedial actions.

The right to terminate the business relationship with the business partner enjoyed by TB International GmbH will not be restricted by the above. This is irrespective of whether the direct business partner itself or any of the other agents it has deployed is guilty of violating the principles defined in this behavioural codex.

#### **17. Complaints Procedure**

Any complaints about or pointers to violations of this behavioural codex can be addressed at any time to TB International GmbH – also anonymously – to the contact persons named below:

The notifying party is obliged only to report such complaints or pointers the truth of which it is genuinely convinced of. All business partners guarantee that no actions, of a disciplinary or any other nature, to the detriment of the notifying party will be taken.



## Corporate Responsibility

### Social Responsibility

Just as we continually strive to create high-performing and innovative products, we also seek to follow the law on social issues important to our employees, shareholders and customers. This includes raising awareness with our employees and within our supply chain about how we can make the right decisions on issues like product safety and work environments affecting those who help us make our products.

### Supplier Responsibility

Callaway Golf strives to follow the applicable law on socially responsible business practices among our employees and throughout our supply chain. Our Supplier Code of Conduct is designed to educate our suppliers about the importance of providing safe working conditions, treating workers with respect and using responsible manufacturing processes.

If you have any questions about our supplier responsibility efforts, please send inquiries to [corporatecompliance@callawaygolf.com](mailto:corporatecompliance@callawaygolf.com).

### Children's Products

We test and certify compliance of children's products according to the Consumer Product

Safety Improvement Act of 2008 (CPSIA) and use guidance provided by the Consumer Product Safety Commission (CPSC). CPSIA Certificate Lookup:

We work closely with certified laboratories to test the materials in our products against current regulatory requirements. We also require our suppliers to follow these requirements. If you have any questions about compliance for Callaway Golf children's products, please send inquiries to [corporatecompliance@callawaygolf.com](mailto:corporatecompliance@callawaygolf.com).

Transparency in Supply Chains Act & UK Modern Day Slavery Act Effective January 1, 2012, revised July 8, 2016

### ABOUT THIS POLICY

This policy describes Callaway Golf Company's ("the Company") response to California's "Transparency in Supply Chains Act of 2010" and the United Kingdom "Modern Slavery Act 2015". On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) went into effect in the State of California. The UK Modern Slavery Act came into force in October 2015. These laws describe the information to be made available by manufacturers and retailers regarding their efforts (if any) to address the issue of slavery and human trafficking. Click to view California's Transparency in Supply Chains Act of 2010. Click to view UK Modern Slavery Act of 2015.

### CORPORATE AND SUPPLIER CODES OF CONDUCT

#### Company Code of Conduct

The Company's Code of Conduct is part of Callaway Golf Company's effort to conduct its global business legally. The Code applies to all board members, officers and employees of the Company and its subsidiaries. All Company employees are required to comply with the Company's Code of Conduct, which includes provisions designed to address the principle that

child, prison, or forced labor are not permitted at any Company supplier operation. The Company's Code of Conduct is applicable throughout the world, and the Company trains employees on these standards from time to time, including new hire training for all incoming employees and ongoing training of all company employees and management who have direct responsibility for supply chain management. This ongoing training specifically addresses education on human trafficking and slavery prohibitions within the product supply chain.

### Organizational Structure and Supply Chain Overview

Through an unwavering commitment to innovation, Callaway Golf Company (NYSE: ELY) creates products and services designed to deliver serious performance and serious fun for every golfer. We are a global leader in advanced golf technology, and for 30 years we have consistently found new ways to empower golfers of all abilities. Callaway Golf Company manufactures and sells golf clubs and golf balls, and sells golf accessories under the Callaway Golf® and Odyssey® brands worldwide.

The Company has its primary golf club assembly facility in Monterrey, Mexico, and maintains limited golf club assembly in its facilities in Carlsbad, California. The Company's golf clubs are also assembled in China, Japan, England and other local markets based on regional demand for custom clubs. In addition, the Company utilizes golf club contract manufacturers in China.

The Company has a golf ball manufacturing facility in Chicopee, Massachusetts, and also utilizes golf ball contract manufacturers in China and Taiwan.

The Company purchases raw materials from domestic and international suppliers in order to meet scheduled production needs. Raw materials include steel, titanium alloys and carbon fiber for the manufacturing of golf clubs, and synthetic rubber, thermoplastics, zinc stearate, zinc oxide and lime stone for the manufacturing of golf balls.



Callaway works closely with a limited supply chain to ensure a premium golf product and experience. Respecting human rights and environmental issues in the supply chain is embedded in processes and agreements used to onboard and approve new suppliers.

#### **Supplier Code of Conduct**

The Company has also adopted and implemented a “Supplier Code of Conduct.” The Supplier Code of Conduct describes the business practices and employment standards applicable to the Company’s direct suppliers on a global basis. Click to view the Supplier Code of Conduct.

Direct suppliers receive copies of or have access to the Supplier Code of Conduct and many suppliers post the Code on site at their various locations.

#### **HOW WE VERIFY COMPLIANCE**

The Company uses various approaches to verify the absence of forced labor and child labor in our supply chain, including the following:

##### **Supply Chain Qualification and Supplier Assessments**

The Company performs assessments of potential suppliers according to a risk-based approach. This approach includes preliminary risk assessments and supplier assessment questionnaires. New supplier screenings are generally conducted internally by Company personnel. Ongoing supplier compliance is typically monitored by a

combination of measures (as discussed below), including supplier self-assessments, Company-conducted audits, and third party audits. The Company uses tools such as regular questionnaires (which are administered by the Company via a web-based service) that are completed by direct tier one suppliers and selected tier two suppliers.

#### **Supplier Audits**

The Company’s audit program evaluates suppliers’ compliance with the Company’s Supplier Code of Conduct. Various types of announced audits are conducted under this program, including onsite audits conducted or attended by Company personnel, collaborative or self-audits, and periodic third-party on-site audits of practices and underlying management systems. If deficiencies are identified, suppliers are required to produce corrective action plans. The corrective action plans typically outline how a supplier will resolve issues uncovered in audits. If any compliance issues are identified, the Company may terminate the supplier relationship or will require action by the supplier to rectify the problem within a designated timeframe.

Currently, site audits are scheduled at most direct supplier sites every two years. These audits are conducted by the Company or by a third party auditing company. The audits are semi-announced audits. This means that the suppliers are given a window of time when the audit will take place, but the exact date of the audit within the timeframe is unannounced.

#### **Terms and Conditions in Purchase Orders and Agreements**

The Company has supply agreements or Purchase Order terms and conditions in place with most direct suppliers, requiring them to comply with applicable laws and regulations, including laws regarding forced labor and child labor. Agreements include provisions limiting the use of sub-contractors; where sub-contractors are used, the sub-contractor must be an “Authorized

Subcontractor” and adhere to the provisions of the Purchase Order.

#### **Corporate Purchasing Policy**

The Company has a Corporate Purchasing Policy in place that applies to all US employees responsible for commitment of funds to external suppliers. The Policy also serves as a guide for all non-US Company employees. Applicable Company employees are responsible for understanding and complying with this Policy. Among other things, the Policy is designed to promote compliance with all applicable federal, state and local laws and regulations.

#### **Supplier Acknowledgement and Agreement**

The Company has instituted a program which requires direct suppliers to certify compliance with the terms and conditions the Company’s Purchase Order Terms and Conditions, Supplier Code of Conduct, U.S. OFAC Memorandum and Foreign Corrupt Practices Act.

#### **Product Compliance**

The Company strives to ensure that products comply with applicable laws and regulations through education, testing, certifications, and audits.

#### **Conflict Free Sourcing**

The Company has policies and procedures to reasonably assure that the use of the tantalum, tin, tungsten and gold in the products manufactured do not directly or indirectly finance armed groups in Covered Countries as defined by the Conflict Minerals Rule issued by the U.S. Securities and Exchange Commission (SEC) under the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Click to view the Company’s Conflict Mineral Policy.

#### **Employee and Supplier Training**

The Company educates employees responsible



for supplier programs on how to identify and report compliance issues. The Company also strives to educate suppliers on relevant regulatory requirements, programs, and Company policies.

#### **Company Legal Compliance Committee and Internal Audit Department**

The Company has a Legal Compliance Committee to address compliance issues on a global basis and to develop systems and procedures to address any ongoing compliance issues in the locations where we conduct operations. The Legal Compliance Committee meets on a regular basis, and the Chief Ethics Officer provides updates of key findings to the Company Board of Directors.

The Company also has an Internal Audit Department that periodically tests supplier compliance with contract terms through a variety of methods. The Company also seeks to promptly address internal accountability standards and procedures for employees or contractors failing to meet Company standards.

#### **POLICY UPDATES**

From time to time, we may change our practices under this policy. We will try to post the latest version of this policy here.

#### **Reporting Human Rights Violations**

If human rights violations are suspected at a Company facility or a facility supplying product to the Company, please contact us

at [corporatecompliance@callawaygolf.com](mailto:corporatecompliance@callawaygolf.com). Violations can also be reported by calling +1 (760) 931-1771 and requesting to speak with the Chief Ethics Officer.

#### **Reporting**

The Company will publish a statement outlining steps taken during each financial year to ensure slavery and human trafficking is not taking place in any part of the Company's supply chain or in any part of the business.

#### **POLICY APPROVAL**

This policy is approved by Board. A signed copy is available upon request.

#### **HOW TO CONTACT US**

If you have any questions about this policy you can email us at [corporatecompliance@callawaygolf.com](mailto:corporatecompliance@callawaygolf.com). If you would like to write to us, our U.S. address is:

Compliance Question  
Callaway Golf Company  
2180 Rutherford Road,  
Carlsbad, California 92008





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## Ethical Statement

Colortone are committed to conducting business in accordance with the highest standards of ethics and respect for human rights and the environment. All our suppliers, distributors, and other business partners must meet these high standards, and, at the most basic level, this means that all such business partners must operate in compliance with the requirements of applicable laws and regulations. While we recognize that different cultural, legal, and ethical systems exist in the countries in which merchandise may be produced, our code of conduct sets forth certain fundamental requirements that must be satisfied by all facilities that supply our products.

Colortone and Gildan Activewear have taken measures to make sure that our products are compliant with the rules and reasonable testing regarding the Consumer Product Safety Improvement Act of 2008. All of our products that are distributed through our supply chain meet the requirements set forth by the Consumer Product Safety Improvement Act of 2008.



### **Ethical Statement**

Comfy Co understands that it is important to our customers that as a brand we care about ethical and environmental issues affecting the regions in which our goods are manufactured. To ensure that these considerations are taken into account when manufacturing our goods, we only work with WRAP certified factories.

Worldwide Responsible Apparel Production (WRAP) requires that all production is made under lawful, humane and ethical conditions with all due adherence to environmentally conscious production methods.

Regular independent monitoring by acknowledged testing authorities ensures that standards are maintained throughout the production process.

# CRAGHOPPERS



no forced labour,  
no human rights



## Ethical Statement

Our business sets out to create the best product around, whilst reviewing our processes from beginning to end, to enable us to reduce our environmental impact. We have established a detailed plan across the business to document what we can do, with key dates and targets.

We keep up to date with industry standards on sustainability and chemical testing of product through our partnership with the EOG (European Outdoor Group), attending webinars, monthly updates and information exchanges at the Outdoor Trade shows.

Craghoppers is now a Bluesign system partner. This is a globally recognised independent system that verifies compliance throughout the production process. It focuses on 5 guiding principles: Resource Productivity, Consumer Safety, Air and Water emissions and Occupational Health & Safety to guarantee a safely manufactured product through a clean process.

We already work with suppliers who are Bluesign system partners and we actively encourage our other suppliers to become Bluesign system partners too, whilst also obtaining OekoTex certificates from our suppliers as verification.

By January 2018 we will become a licensee for the Higgs index, submitting our first evaluation by May 2018. This self-assessment standard is unique to the apparel and footwear industry and we will

be using it to assess our environmental and social sustainability throughout our supply chain.

This will help us, every year, to identify areas for improvement and benchmark our performance against the Industry.

The assessment is based on modules which consider corporate policies and practices in every impact area and at every level of sustainability. We will enter our own data and will receive performance scores broken down by category as well as an overall company score. The scores are displayed anonymously to everyone using this standard which allows other brands and retailers to benchmark their performance and discover where they stand compared to others

Our involvement with the Higg Index will enable us to strive for better improvements where required and ultimately raise the bar on our sustainability efforts.

## THE MICROFIBRE CONSORTIUM

The Microfibre consortium was created by European Outdoor Group, we joined the consortium in June 2017.

The consortium is made up of a selection of EOG members, all brands, working alongside experts to review and find a solution to reducing the fibre loss during production, wear and washing that has been contaminating our water systems and oceans. Collaborative links exist with sister organisations such as the Scandinavian Outdoor Group, Peak Innovation and also the Boulder (CO, USA) based Outdoor Industry Association.

The members fund and review findings on research that will initially aim to answer and consolidate fundamental questions, such as:

- **How much microfibre shedding are we producing?**
- **How are the fibres being shed?**
- **What fabric types could be the key offenders?**

The desired outcome of this first phase is an open source database that details research findings

about the effect polymer, yarn and textile structure may play on Microfibre shedding.

## CHEMICAL TESTING

Global attitudes to chemicals have intensified in the past decade. We have seen the introduction of the EU REACH programme's restricted substance list that began evaluating and regulating chemicals being produced before entering specific countries. Many countries have now begun similar programmes in order to review and restrict harmful chemicals. Each season we evaluate the ranges with a rigorous testing programme in place. The Group reviews all its regulations against global directives to ensure that we are compliant.

Already PFOS and PFOA free, Craghoppers is working to replace DWR (Durable Water Repellent) treatments with PFCs (Perfluorinated compounds) with more environmentally friendly alternatives by 2020.

## ENERGY EFFICIENCY

Our warehouses are fitted with high frequency TS light fittings and they are on sensors so the energy used changes to the presence of people in that area. Lighting sensors are also used throughout the offices. We also use low energy usage battery chargers for all our MHE.

## WASTE MANAGEMENT

Our sites in the UK all comply with waste management legislation and the relevant environmental regulations by recording all movements of general waste.

This is then matched with certificates received from authorised contractors, verifying the appropriate disposal. Clean and foul drain systems are identified where appropriate and comply with the requirements of pollution control regulations. Arrangements are in place to manage chemical spillage with appropriate spill kits installed at all site facilities.

# CRAGHOPPERS

## CONTROL OF HAZARDOUS SUBSTANCES

The health, safety and welfare of our employees and anyone else who comes into contact with our operations are of paramount importance.

We ensure that we comply with regulations set out to manage the presence and use of chemicals or substances that may be potentially hazardous to health. This is relevant both within our own operational sites and those of our key supply chain partners.

We have management systems in place that comply with the requirements of The Control of Substances Hazardous to Health Regulations 2002 (COSHH). Under these regulations, UK operations evaluate and control the risks to the health of all employees from exposure to hazardous substances at work.

We carry out 3rd party audits on our supply chain manufacturers to verify that they comply with local legislation ensuring as a minimum that:

- **Chemicals are well covered and safely stored**
- **Workers handling chemicals are appropriately trained**
- **Workers have access to suitable equipment and protective clothing when handling any chemicals**

## RECYCLING

The recycling schemes at our Head Office and warehouse site have recorded 0% office waste in landfill from June 2016 onwards. In 2015, 483 tonnes of paper and 5 tonnes of plastic were

recycled

We aim to recycle as much waste as is reasonably possible. At all our operating sites we have recycle centres and we segregate waste streams ready for disposal.

Working with properly registered and licensed contractors, the following waste streams are shipped to recycling facilities:

- **Cardboard packaging**
- **Polythene packaging**
- **Office paper**
- **Printer cartridges**
- **Lamps & lights**
- **WEEE (electronic equipment)**
- **Cans**
- **Bottles**
- **Wood**

We do have returned stock and samples and avoid sending any pieces of surplus product to landfill by donating 90% of this to charity. In addition, Craghoppers offer a Lifetime guarantee providing information for the products care and repair. Products are replaced if there is a quality issue.



### **Ethical Statement**

VF's Ethics and Compliance Program is overseen by VF's Vice President, General Counsel and Corporate Secretary. VF's Vice President, Ethics and Compliance, leads the program's strategic and day-to-day operations. Our Ethics and Compliance Leadership Council, made up of members of VF's Senior Leadership Team and other executives, is responsible for ensuring the effectiveness of our program.

At VF, integrity never goes out of fashion. Our success is a direct result of the values we embrace as a company and as people. To us, values such as honesty, integrity and respect are more than words—they are embedded in everything we do. Our Code of Business Conduct ("Code") demonstrates how our core values come to life in our day-to-day business dealings. It lays out common scenarios and gives us the guidance we need—or the resources to turn to when guidance isn't enough—to help ensure we act ethically at all times. By setting forth the high standards we are expected to uphold, our Code also serves as a pledge we make to our shareholders, our customers and each other. We commit to act with integrity—not only because it contributes to our success, but also because it is the right way to achieve success.



## **Ethical Statement**

### **Environmentally Sound Business Practices.**

No matter how much we love what we do, in the grand scheme of things, we're just making hats here. We know there are more important things in life, such as having a positive impact on our world. That especially holds true in regard to our environment. Taking short cuts to stretch out profits is just bad business. All of our raw materials and processes are carefully selected and monitored to ensure they are not harming our planet. We look to tough European standards as our benchmark, as well as companies whose environmental policies we admire. So you can rest assured that our hats stand for both quality and environmentally sound business practices.





FRUIT OF THE LOOM®

amfori BSCI  
Made with purpose



### Ethical Statement

#### MAKE IT ETHICAL - THE ONLY WAY IT SHOULD BE

Fruit of the Loom doesn't just make great garments; we make them the right way too. That means protecting the rights of all people we work with and doing what's right for the environment – from raw material through to final garment. We've set our high standards in our own charter that we call The Fruit Code. Every supplier we work with is independently audited by WRAP or according to the amfori BSCI standard to ensure they meet our compliance requirements. We only use ethically-produced yarn and all our garments are independently Oeko-Tex Standard 100 approved, which certifies that they contain absolutely no substances that are harmful to humans or the environment.

#### Made In Morocco – Made By Us Means Made Better For You

Control is vitally important to Fruit of the Loom and our huge custom-built state-of-the-art manufacturing plant in Morocco gives us the control we need to bring you the garments you count on us for. We produce over 2 million garments every week – with up to 50 million always in stock. We employ a staff of over 4,300 locally-employed people, working in a multi-shift operation across our production and sewing plants, and we ensure the respect and wellbeing of

our workforce with benefits including healthcare, dental care, training and transport. We are entirely self-sufficient with our own substation and water-treatment facility that recycles up to 60% of the water we use, returning it to the river cleaner than when it arrived. As a result of this, the river bed has completely regenerated and is once again alive with fish and wildlife.

### Our Code Of Conduct

Fruit of the Loom is committed to conducting its business in accordance with the highest standard of business ethics and respect for human rights, and in compliance with all applicable laws. We require our suppliers, licensees, distributors and other business partners to meet these high standards. While the Company recognizes that different cultural, legal and ethical systems exist in the countries in which merchandise may be manufactured, our Code of Conduct sets forth certain basic requirements that all facilities, domestic and foreign, whether owned and operated by the Company or our contractors, licensees or other business partners, must satisfy. Each one of our Business partners must have the Code of Conduct displayed in a prominent position in their factories in English and in the local language.

### Supply Chain Code Of Conduct Compliance

Our company has a long-standing commitment of conducting business in an ethical manner, ensuring respect for human rights and the law. We select business partners who share that commitment. As indicated in the Fruit of the Loom Code of Conduct, we strive to maintain consistent standards in all facilities involved in the manufacture and distribution of our products.

### Statement On Plastic Waste Management:

Process and cotton wastes are recovered, reused and conditioned for removal by specialised

companies. Convention with neighbouring Cement Works for co-processing boiler ash within their plant. Consistent reduction of cutwork wrapping stretch film and PVC pallets by introducing reusable Dura Green packs. Elimination of plastic bags usage for second quality garments.

# GLENMUIR

## 1891



Ethical  
Trading  
Initiative

For workers' rights,  
for better business.



### Ethical Statement

Glenmuir is a business which has been crafting the finest clothing since 1891. We are leaders in golf clothing in the UK and Europe. We take the quality, durability, reliability and provenance of our products extremely seriously.

Please find below some information on our strict policies and performance standards which we adhere to across our business and supply chains.

### Operating Processes

Glenmuir operates a QMS which mirrors the requirements of ISO 9001:2008 with external audits.

### Glenmuir Supply Chain

Glenmuir is committed to the principal of Ethical trading and has a conscientious adherence to health and safety rules and regulations. Through our group we are part of the ETI (ethical trading initiative) and registered with SEDEX.

All of our suppliers are selected on the basis that they conform to strict conditions on quality of product and comply with current legislation – including child labour and fair rates of pay.

In addition, we select partners who specialise in product supply into Europe and who are fully conversant with EEC requirements.

We have put in place a formal manufacturing agreement with all suppliers covering Ethical Trading requirements – and will not transact any business till this has been formally signed. In addition we have regular site visits to check for conformity.

### Glenmuir Environmental Performance

No hazardous chemicals or processes are used at our manufacturing facility.

We understand that all products within our product ranges comply with REACH regulations – Registration, Evaluation, Authorisation and Restrictions of Chemicals that appear on the current candidate list <http://echa.europa.eu/web/guest/candidate-list-table>

Any waste generated at our production facility is recycled where appropriate using the auspices of VIRIDOR.

I do hope this answers any queries you may have but please do not hesitate to contact me if there are any further queries you may have.

Yours sincerely.

Mikhel Ruia  
Managing Director



## Corporate Social Responsibility & Ethical Sourcing

We are proud of our unique record of supplying quality products and service to the sports industry as a family business over 160 years. These core principles guide our actions to deliver products and services that are safe, compliant and preferred by sports enthusiasts and players at every level.

We take our Corporate social responsibilities very seriously; all our brands operate to our strict policy that meets the exacting standards and requirements of the many governing bodies that use our products.

### Vendors

We select and retain long-term relationships with our partners who follow business practices consistent with our company values. Our factories are responsible for compliance with all applicable laws and regulations and our policy ensures these that these are met and in many cases, surpassed.

### Ethical Sourcing

We are committed to make a positive and lasting difference to the socio-environmental implications of garment manufacturing and ensure that our robust ethical policies meet the below criteria;

- No use of child labour
- No use of forced labour

- Safe & healthy working conditions
- Legal labour contracts
- Payment of living wage
- Freedom of association
- The right to collective bargaining
- No discrimination against employees
- No excessive hours of work

### Products

We use the latest technologies and fabrics available to ensure we reduce the carbon footprint of our production. For example we have utilised recycled polyester in our Pro Range Teamwear collection and organic cotton in our Quest Teamwear collection.

As a major manufacturer of Willow crickets bats, we have a policy of planting three trees for every one felled. In addition to this we have investments in many set beds where on average over 5000 new trees are planted every year. Whilst this is necessary for the continuation of our business we are well aware of the add-on benefit that this activity infers upon the Company as a whole in terms of moderating our carbon foot print. In addition all wood materials left over from cricket bat manufacture are collected and sent locally to be used in the production of Bio Fuel.

### Transportation

We endeavour to ship our products by sea where possible – greatly reducing our carbon footprint.

### Packaging

We limit the amount of packaging associated with our products. As a result our standard method of supply is to package items together with no individual packaging.

### Paperless administration

Over the past few years we have invested a

significant amount of resource in building a paperless ordering and administration system. As a result we now only accept orders from our customers via our online stock management system –reducing the obvious waste in printed paper.



### Ethical Statement

Henbury work with the very highest level of manufacturers, developing strong, long-term partnerships to promote understanding of International Ethical Trading practices. Working with our factories to promote respect for workers' rights, ensuring workers are free from exploitation and discrimination, and who enjoy conditions of freedom, security and equality.

We fully recognise the importance of the people and the countries where we manufacture, and we require any associated manufacturer or supplier to share our commitment to fair and safe working practices. Our manufacturing locations are personally selected, inspected via an independent, fully recognised and accredited Ethical Auditing body, supported with continuous monitoring by our local representatives. This ensures working conditions and practices are of the highest standard and within local Government Laws.

In addition to ensuring our high Ethical standards are achieved, we support and sponsor a number of local charities within the communities in which we work and manufacture.

WRAP is one of a number of Ethical Auditing organisations dedicated to the certification of lawful, humane and ethical manufacturing

throughout the world. We also work with a number of other Ethical Auditing organisations. All Henbury's Shirts, Cotton and Poly/Cotton Polo's are WRAP certified. Henbury work with the very highest level of manufacturers, developing strong, long-term partnerships to promote understanding of International Ethical Trading practices. Working with our factories to promote respect for workers' rights, ensuring workers are free from exploitation and discrimination, and who enjoy conditions of freedom, security and equality.

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# KARIBAN

## PROACT.®

ki.mood



### Ethical Statement

Kariban is committed to conducting business in accordance with the highest standard of business ethics and respect for human rights, and in compliance with all applicable laws. We have a responsibility towards all persons involved with the production of our products. We therefore require our suppliers, agents, distributors and other business partners to meet these high standards. While we recognise that different cultural, legal and ethical systems exist in the countries in which our products may be manufactured, this Code of Conduct sets forth certain basic requirements that all manufacturing facilities must satisfy.

### Code Of Conduct For Suppliers

#### Legal Compliance

We require all manufacturing facilities to operate in compliance with the requirements of applicable laws and regulations alongside this Code of Conduct and to apply that provision which offers the greater protection.

#### Social Compliance

Our suppliers must be in compliance with international human rights standards and international labour legislation.

#### Forced Labour

The use of forced or compulsory, indentured, or bonded labour is prohibited.

#### Health and Safety

Working conditions throughout all manufacturing facilities must be safe, hygienic and meet or exceed requirements of all local health and safety laws and regulations particularly those pertaining to building standards and emergency procedures. Workers must be adequately trained and equipped to perform their jobs safely and made aware of any industry specific hazards. Workers must have access to clean toilets and clean drinking water.

#### Freedom of Association

We recognise and respect the rights of employees to freedom of association and collective bargaining and expect all our suppliers to do the same.

#### Discrimination

Discrimination in hiring, pay, promotions, discipline, termination or other terms and conditions of employment based on gender, age, religion, marital status, social status, personal beliefs or other legally protected criteria, is prohibited.

#### Child Labour

Manufacturers and suppliers shall not employ minors and Should be in adequate with the local law. All our authorised facilities must observe all legal requirements for work of all employees, particularly those pertaining to hours of work, working conditions, worker health and worker safety.

#### Harassment or Abuse

Corporal punishment or other forms of harassment, abuse or coercion, whether verbal, mental, physical

or sexual, are strictly forbidden.

#### Wages And Benefits

All facilities should ensure that employees be fairly compensated by providing wages, including overtime pay, and benefits that meet or exceed all applicable local laws and regulations. Wage levels and benefits should be regularly benchmarked against industry best practice and/or collective agreements and adjusted accordingly.

#### Working Hours

All facilities should ensure set working hours comply with national laws or benchmark industry standard whichever offers the greater protection to worker health, safety and welfare. Ideally a standard working week will comprise 48 working hours excluding overtime. Overtime will be considered voluntary and will not exceed 12 hours in a working week. Workers will be entitled to a full working day off every 7 days.

KUSTOM KIT.  **GAMEGEAR®**



## Ethical Statement

Kustom Kit believes that business should be conducted with total respect for people and the environment. We adopt a rigorous selection process for garment manufacturers, ensuring only those that are totally committed to exceeding our high ethical standards become appointed suppliers. We have never purchased from a supplier that we haven't inspected and approved personally.

We do not own our factories and choose instead to build strong working relationships with carefully selected suppliers. We employ local agents and staff based in each of our garment factories whose sole focus is to ensure total compliance of our strict ethical standards for suppliers and to test fabric and finished garments at source.

## Supply Chain Code Of Conduct Compliance

Our products are manufactured by different supplier organisations employing thousands of people in several countries. We recognise and honour our duty to protect the workforce employed to manufacture our garments and work tirelessly with our suppliers to ensure the provision of fair wages and working hours, safe and hygienic working conditions, regular employment and no discrimination, harsh or inhumane treatment of

employees.

In order to manufacture Kustom Kit garments, each appointed supplier must comply with national and other applicable laws and conform to the following terms as a minimum requirement:

- **Children must not be employed below the legal minimum age required by the law of the individual country.**
- **Employees are to be paid above the legal minimum wage as required by the law of the individual country.**
- **Working hours must not exceed those set out by local legislation. Overtime must always be voluntary and remunerated at a premium rate.**
- **Maternity leave must be made available to all female employees.**
- **Employment is freely chosen and no discrimination is practiced. There is no use of forced or involuntary labour and employees are free to leave their employment after reasonable notice.**
- **Good working conditions must prevail. The provision of adequate wash room facilities and a canteen are essential.**
- **Primary medical care must be provided on site.**
- **Correct procedure and policies should be in place to ensure employee health and safety.**
- **Workers' representatives are not discriminated against and are allowed access to the workplace to carry out their representative functions.**
- **Ensure that their own supply chain shares our ethics and is compliant to Kustom Kit's code of conduct.**
- **We do not accept outsourcing or the use of homeworkers. Failure to adhere to this condition will result in breach of contract.**

- **Agree to an independent audit as specified by Kustom Kit.**

## Factory Auditing

An ethical audit is a formal examination of the labour practices of a workplace or company. It is a verifiable process to understand, measure, report on and help improve an organisation's social and environmental performance. As a further safeguard our garment manufacturers must agree to permit regular unannounced visits from our senior management team.

We demand that all of our garment manufacturers hold a valid audit from at least one of the following:

- **WRAP - Worldwide Responsible Accredited Production**
- **BSCI - Business Social Compliance Initiative**
- **SMETA - Sedex Members Ethical Trade Audit**

## Modern Slavery Statement

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## Our Suppliers

Kustom Kit operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that the particular organisation has never been convicted of offences relating to modern slavery and on-site audits that include a review of working conditions. Our anti-slavery policy forms part of our working agreement with all suppliers and they are required



KUSTOM KIT.

CLAYTON  
& FORD

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KUSTOM KIT.  
bargear.

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FORMULA  
RACING

to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They adhere to our ethical policy.
- They hold at least one of the following factory audits; WRAP, SEDEX or BSCI.
- The factory makes audit reports available to Kustom Kit.
- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- They pay their employees any prevailing minimum wage applicable within their country of operations.
- They will allow UK employees to audit the factories when requested.
- We may terminate the contract at any time should any instance of modern slavery come to light.
- 

#### Our Environmental Policy

We recognise that our business activities affect the natural environment in a number of ways. We strive through continuing improvement to minimise the adverse effects on the environment and the earth's natural resources, whilst safeguarding the health & safety of our employees

and the public. We purposely seek out suppliers who take positive action to minimise both waste and the impact of their manufacturing processes on the surrounding environment.

Internally, we constantly look for ways to reduce waste through more efficient procedures and recycling initiatives. These include recycling pallets and shredding cardboard for re-use in packaging. We have also eliminated plastic strapping from all cartons and are reducing plastic packaging wherever possible.

#### We aim to always:

- **Comply with or exceed relevant legislative requirements. Where these are inadequate we will set our own standards that comply with our environmental and ethical criteria.**
- **Progressively reduce the environmental impact caused by our products and activities.**
- **Design and manufacture our products with consideration for the environment.**
- **Encourage manufacturing suppliers to recognise their environmental responsibilities and offer support to help them implement sound environmental health and safety policies and practices and to insist that the same practices are implemented within their own supply chain.**
- **Ensure that no chemicals deemed harmful to humans or the environment are present in our products.**
- **Insist that every component in all products hold a valid Oeko-Tex Standard 100 certificate to guarantee chemically safe garments.**

#### European Regulation (EC 2006/1907-REACH regulation)

REACH is a European Regulation concerning chemicals and their safe usage. It aims to improve the protection of human health and the environment through a system of Registration, Evaluation, Authorisation and restriction of

Chemicals. Chemicals deemed as harmful are added to the 'substance of very high concern list'. Kustom Kit products do not contain any of the chemicals on this list in any quantity and we actively work with REACH Ready to ensure compliance. The restricted substance list is usually updated twice a year. Kustom Kit routinely checks all products against any new listing to ensure we maintain this standard.

#### Oeko-Tex Standard 100

Oeko-Tex is an independent globally standardised certification especially developed for textiles. Its primary purpose is to ensure that the chemicals used in the manufacture of textile products are in no way damaging to health. At Kustom Kit we understand what the modern wearer demands from their clothing. We expect colours to be brighter, we want our shirts to need little or no ironing and we require our sportswear to be fully functional keeping us both warm and dry. We test every component from fabric to thread, every label, lining, button and zip so that our customers never have to compromise on comfort or performance. Oeko-Tex Standard 100 allows Kustom Kit to deliver innovative fabrics and designs with complete confidence that no harmful chemicals have been used in their manufacture. Kustom Kit demands all products achieve this certification.

#### Oeko-Tex STeP - Promoting Sustainable Textile production

STeP is an additional factory audit which places emphasis on environmental performance and social responsibility. It is only gained by factories who achieve the highest level of sustainable production and safety ethics. The fabric used to manufacture the majority of our shirts is produced in a STeP accredited factory. We are working with our entire manufacturing base to encourage them to take part in the STeP auditing scheme.

KUSTOM KIT.  **GAMEGEAR®**



### Oeko-Tex Made In Green

Made in Green is a traceable label that applies exclusively to textiles. It communicates that the garment/fabric has not only been tested for harmful substances as certified by standard 100 but is also sustainably produced in accordance to Oeko-Tex guidelines. Labelled product is available, please contact customer services for details, MOQ's and lead-times.

### SUMMARY

Kustom Kit confirms the following;

- All factories that manufacture Kustom Kit garments hold at least one of the following ethical audits – WRAP, BSCI or SMETA.
- That none of our products contain any of the current substances of very high concern in accordance to European Regulation (EC) 2006/1907 – Reach Regulation.
- All components used in our garments have been tested to Oeko-Tex Standard 100 and hold a current certificate testifying this fact.
- Our management team regularly audit all of our garment manufacturing facilities and key suppliers to these factories.

A full copy of our ethical statement is available on our website or by contacting Customer Services.



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### **Ethical Statement**

Maddins believe the customer should be able to trust the clothes they have bought have been created under reputable circumstances. Maddins follow a policy that underlines the commitment to integrity of all our business practices.

Maddins are conscious of the impact on the environment from our industry, and as such looks to minimise the effect that our operations have.

Maddins only work with partners who have the same beliefs as we do, and follow guidelines on forced and child labour, harassment or abuse, non-discrimination, health and safety, freedom of association and collective bargaining, wages and benefits, hours of work and overtime compensation.



supplier's recommendations, Madeira's dyestuffs are non-toxic to workers, the environment and the end user – before, during and after production.

Created with sensitive production processes in the heart of the naturally environmentally conscious 'Black Forest', Madeira's EnviroSystem applies long term commitment to the global impact of environmental issues, second to none.

### **Ethical Statement**

#### **Madeira Resource Management**

Through the media, we are all aware that every single one of us has accountability for the environment and the legacy of our actions or lack of them.

Madeira's beautiful and exclusive threads harmonise style, quality and colour with all environmental and ethical needs. Almost 100 years of experience in producing the most consistent high quality, fashionable and widest range of embroidery threads, means Madeira threads are the choice of leading brands worldwide.

Applied onto wide and varied items from shoes to hats, toys to towels and across diverse industries from fashion and sportswear to automobiles – critical from the outset is the selection of only the best raw materials.

#### **REACH and MADEIRA EnviroSystem**

REACH = Registration, Evaluation, Authorisation and Chemical Restriction. Even prior to REACH, Madeira subscribed to the philosophy of only using substances which were neither hazardous nor dangerous to people or the valuable eco-system.

No APO/APE softeners (Alkyl Phenol Oethoxylates/Ethoxylates), which are found in some threads, are used to finish Madeira's threads. All meaning that, following



## Ethical Statement

NIKE, Inc.'s success as a growth company is tied directly to our culture of innovation. Today we believe that sustainable innovation that benefits the athlete, the company and the planet will play a key role in the future of our business.

This principle shapes how NIKE does business. The results we see continue to motivate us. As you will read in this report, we are pushing the boundaries to decouple our growth from constrained resources in order to leave the lightest possible footprint, while driving uncompromising performance for athletes everywhere.

We are constantly integrating more sustainable ways of working across our business – from design to production, to logistics and retail. While this work propels us forward we also recognize that NIKE is positioned to leverage the power of our brand to drive positive change across our entire value chain, within our industry and beyond.

## Sustainable Innovation Insights

Spanning almost 20 years, NIKE's sustainability journey has been dynamic, marked by an ever-evolving set of challenges and opportunities. As we continue to raise the bar on our approach, we see new opportunities. Three that stand out as I reflect on our FY12/13 progress are:

**1. Sustainability and business growth are complementary.** Our strategy to create value while pursuing innovation that reduces our impact on the environment, is delivering measurable results. For example, the natural assumption is that as revenue goes up so does a company's greenhouse

gas emissions as more sales translates to increased product manufacturing and freight activity. However through a variety of initiatives we have been able to change the results of that equation, reducing absolute greenhouse gas emissions by close to 3 percent while simultaneously increasing revenues by 26 percent over the time period covered by this report. This motivates us to push even harder for sustainable innovation across the business.

Breakthrough technologies like NIKE Flyknit, which dramatically reduces waste compared with traditional footwear manufacturing, and ColorDry, which eliminates water and process chemicals from dyeing while also driving down energy consumption, increasing productivity and improving quality, provide just a snapshot of the game-changing innovation that will help fuel NIKE's sustainable growth.

**2. Materials Matter.** Six years ago we identified that nearly 60 percent of the environmental impact of a pair of NIKE shoes was in materials used to make it. That insight, along with our commitment to design with purpose, has helped sharpen our focus on the need for disruptive innovation in the world of materials.

Arguably, the last major breakthrough in materials that reshaped the industry at scale, was the introduction of polyester about 50 years ago. We believe there are significant innovation opportunities ahead and are working to unlock the barriers to developing and scaling a new palette of more sustainable materials, but we cannot do so alone.

To effectively drive systemic change we know we must collaborate and seek out unconventional partnerships. Through our LAUNCH partnership with NASA, US Agency for International Development, and the US Department of State, we are working to uncover innovations in sustainable materials that can have a positive impact on people and the planet.

**3. Climate change requires business change.** At NIKE, everything we do begins with the athlete. We know that climate-related issues, like pollution and extreme weather conditions, impact an athlete's ability to perform and the changing environment presents a unique set of innovation challenges. Similarly, as a business with diverse global operations, NIKE's supply chain is exposed to a range of changing risk factors. This means that our products, as well as how and where they are made, are fundamental considerations in the long-term success of our business.

NIKE's approach to meta-trend analysis, future-casting and innovating for long-term growth, will help drive performance in the short term, while also positioning us to continue to turn risks into innovation opportunities over the long term.

## From Reputation Management To Innovation Opportunity.

As NIKE has grown and changed, we have fundamentally shifted our sustainability strategy. Early on, we learned that rather than just managing our reputation by reacting to criticism about our supply chain, we could create real opportunities for change by creating an environment of industry collaboration, partnership and transparency.

This approach has continued to evolve to one where we are harnessing the power of innovation to manage risks, create opportunities and meet our sustainability and social goals, adding value to our business and brand.

In 2013, in recognition of the importance of sustainability to NIKE's Innovation strategy, we transitioned our Sustainable Business & Innovation organization into NIKE's core Innovation function, signaling the enterprise-wide role sustainable innovation will play in NIKE's future.

During the period this report covers, we also worked with two leading academic institutions – Harvard Business School and Stanford Graduate School of Business – on case studies that examine NIKE's journey since the 1990s. As these teaching instruments are more widely adopted, we hope



NIKE's experience as one of the first brands to respond to the challenges of responsibility associated with globalization, will positively inform the decisions of tomorrow's business leaders.

### **Enhancing Performance Through Transparency**

In our previous report, we established new sustainability targets across all impact areas in our value chain; most of which are 2015 targets. In the interim, this report provides a detailed account of the progress we have made and where we have faced challenges.

Our performance against targets is detailed extensively throughout this report. We believe that disclosing our targets and reporting against them provides a strong mechanism to continue to drive internal integration and build external understanding among all of our stakeholders.

We established a new norm by disclosing our factory base back in 2005, and we still believe transparency is essential for industry change. We also continue to work with global influencers, including the United Nations Global Compact, in support of global principles in the areas of human rights, labor, the environment and anti-corruption.

### **It's Not A Question Of Less; It's A Question Of Better**

NIKE is dedicated to serving athletes and helping them reach their full potential. As a growth company we are dedicated to creating value for our shareholders. The world in which athletes and

companies compete is changing fast. We believe business has a critical role to play in meeting the challenges of a changing world – addressing climate change, preserving the earth's constrained resources, enhancing global economic opportunity – not by reducing growth but by redefining it. To do this we believe businesses must embrace sustainability as an innovation opportunity and governments should act to create the right policies and incentives to accelerate change at scale.

By sharing our experience, documenting our progress, noting where we have fallen short and identifying the challenges that lie ahead, we hope NIKE can help positively shape the future.

The challenge to create a sustainable economy is global and requires a global response. We believe it begins with a simple idea: invent better solutions.





## Ethical Statement

### CSR

We take our social responsibility seriously, and always aim toward a more sustainable development. We consider CSR to be an integrated part of our business and an essential element in our company's development.

### Code of Conduct

We strive to make a positive difference to our social, environmental and economic responsibilities, that are founded under the headings People, Planet and Profit.

### 10 to follow

1. Nimbus will support and respect the protection of internationally proclaimed human rights.
2. Nimbus will make sure that they are not complicit in human rights abuses.
3. Nimbus will uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Nimbus supports the elimination of all forms of forced and compulsory labour.
5. Nimbus will support the effective abolition of child labour.
6. Nimbus will abolish discrimination in relation to

work and employment conditions.

7. Nimbus will support a precautionary approach to environmental challenges.

8. Nimbus will support initiatives to promote greater environmental responsibility.

9. Nimbus will encourage the development and diffusion of environmentally friendly technologies.

10. Nimbus will work against corruption in all its forms, including extortion and bribery.

### Who we work with

We are working towards a more responsible and sustainable way of producing and in order to live up to our CSR & Sustainability strategy, we are very selective about who we cooperate with. Using audits and assessment tools to select and monitor factories and by favouring fewer partners over many, we build long-lasting and close partnerships with our suppliers. At Nimbus Nordic A/S we only work with CSR certified suppliers who act in accordance with our Code of Conduct.



### **Ethical Statement**

The Portwest Ltd company controls and manages its activities to ensure risks to health, safety and welfare of its employees, customers and the general public are identified and action taken to eliminate or minimise their effects.

**Adverse effects of operational activities on the environment will be minimised as much as possible.**

### **Tips & Guidelines**

To comply with it's legal obligations under the current Health, Safety and Welfare Act, Environmental Protection Act and the European and Dutch Acts, regulations, policies and laws.

To promote health, safety and environmental awareness throughout the organisation.

To maintain a safe and healthy working environment for its employees, with adequate facilities appropriate to the nature of the business activities.

To ensure all suppliers fully comply with the principles outlined in our Ethical Trading Code of Conduct.

To minimise the social impact of the company activities and avoid damage to the environment through regular reviews of the business from environmental and management systems audits.



## Ethical Statement

### 1. INTRODUCTION

Premier Clothing Ltd (“Premier”) strives to conduct business to the highest ethical and environmental standards seeking to use and utilise manufacturers that do the same. Premier has its own detailed code of conduct, which is integral to its business and that all suppliers and their sources must adhere to. Premier’s code of conduct is based on current best practices with regard to employment ethics, health and safety practices and environmental practices; so that when a customer purchases our goods, they know that they have been produced under acceptable conditions. That means that the goods must have been produced:

- lawfully, through fair and honest dealing;
- without exploiting the people who made them;
- in decent working conditions;
- reducing the environmental impact during production and transportation.

Premier has the right to run audits and spot checks by themselves or by external parties on premises without their prior knowledge to verify that they are behaving in an appropriate manner. Third party audits are also carried out by independent bodies such as BSCI and WRAP.

### 2. EMPLOYMENT

All suppliers must meet the local laws on conditions such as minimum wages, hours of work, overtime and deductions. Or, where determinable the prevailing industry wage for the type of work involved. (International Labour Organisation (ILO) Conventions 1, 26, 95, 131 and Recommendation 85)

### 3. EMPLOYING CHILDREN

Premier does not condone the use of child labour and our suppliers must not employ children, other than under the ILO Convention 138 and Recommendation 146. Premier does support legitimate, legally sanctioned, apprentices and educated-related work as long as the child is not being exploited, there is no risk to the child’s health, education and development, and you have the permission of the child’s parents. (Article 32 of the United Nations Convention on the Rights of the Child)

### 4. FORCED LABOUR

Forced labour, whether in the form of prison, bonded or uncompensated labour is not used. People are not forced to work for our suppliers by threatening them with a penalty. (ILO Conventions 29 and 105, Recommendation 35).

### 5. DISCIPLINARY PRACTICES

Every employee must be treated with respect and dignity. No employee is treated with threatening behaviour, physical punishment or any form of mental or verbal abuse.

### 6. NON-DISCRIMINATION

Premier suppliers employ and deal with all their employees fairly and without discrimination. (ILO Convention 100 and 111 and Recommendation 90 and 111) This is regardless of age, sex, race, religion or disability.

### 7. FREEDOM OF ASSOCIATION

Suppliers acknowledge that employees have the right to associate or unionise with any organisation that is legal in that country (ILO Convention 87).

### 8. HEALTH, SAFETY AND WELFARE

- Premier’s suppliers all provide a safe place of work, meeting all local laws relating to health, safety and welfare in the workplace. This means:
- Every effort is made to prevent accidents or injury.
- Health and safety procedures are implemented, and employees are regularly trained and tested in what to do in certain situations.
- There is always adequate lighting and ventilation; and clean drinking water is always available

### 9. ENVIRONMENT

Premier is continuing to develop its environment practices both in the production of the garments, the choice of fabrics used and the Premier working environment. Key examples of these procedures are:

#### 9.1 GARMENT PRODUCTION

All companies comply with the EU general Product safety Directive 2001/95 EC. Premier is working towards all suppliers complying with the requirements of the Azo dye directive and Nickel directives meaning that no Dangerous substances and Preparations are used during the makeup of any of its garments. Premier is constantly working to minimise the waste fabric during production operations

#### 9.2 FABRICS

Premier uses Klopman fabric in some of its garments which carries the EU “Eco-label”



standard which means that all these products have been manufactured in an environmentally responsible and sustainable way. All liquid by-products in the production of the Premier Klopman range are neutralised before discharge into an on-site effluent treatment plant and wherever possible water is recycled. Premier is working towards all the range carrying the Oeko-Tex Standard 100 'Confidence in textiles' which promotes the use of environmentally friendly materials and manufacturing methods. This also ensures conformity to the European Directive relating to Azo colourants

#### 9.4 REACH

REACH is a European Union regulation concerning the Registration, Evaluation, Authorisation and restriction of Chemicals. Its aim is to protect human health and the environment from the risks arising from the use of chemicals. It came into force on 1st June 2007 and replaced a number of European directives and regulations with a single system.

Hazardous chemicals are defined as Substances of Very High Concern (SVHCs) and are listed on the European Chemicals Agency (ECHA) website at [http://echa.europa.eu/chem\\_data/authorisation\\_process/candidate\\_list\\_table\\_en.asp](http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp)

Premier can confirm that the products supplied to you via Premier Clothing Ltd conform to current REACH regulations and do not contain any of the harmful substances controlled under its restricted substances list.

#### 9.5 HEAD OFFICE RECYCLING

- Toner cartridges from laser printers are returned to the manufacturer for recycling;
- All cardboard waste from the warehouse is recycled;
- Premier is working towards all their plastic bags carrying recyclable logos;
- Use of environmentally friendly office consumables where possible;
- Collection point for office staff to recycle paper;
- Email is our preferred method of communication to reduce the amount of paper used.

#### 10 INDEPENDENT VERIFICATION

Premier is currently working to ensure that all factories comply with WRAP (Worldwide Responsible Accredited Production) or BSCI (Business Social Compliance Initiative) standards.

##### 10.1 WRAP

WRAP is an independent, objective, non-profit team of global social compliance experts dedicated to promoting safe, lawful, humane, and ethical manufacturing around the world through certification and education. The 12 principles of WRAP are as follows:

- Compliance with Laws and Workplace Regulations Facilities will comply with laws and regulations in all locations where they conduct business.
- Prohibition of Forced Labor Facilities will not use involuntary, forced or trafficked labor.
- Prohibition of Child Labor Facilities will not hire any employee under the age of 14 or under the minimum age established by law for employment, whichever is greater, or any employee whose employment would interfere with compulsory schooling.
- Prohibition of Harassment or Abuse Facilities

will provide a work environment free of supervisory or co-worker harassment or abuse, and free of corporal punishment in any form.

- Compensation and Benefits Facilities will pay at least the minimum total compensation required by local law, including all mandated wages, allowances & benefits.
- Hours of Work Hours worked each day, and days worked each week, shall not exceed the limitations of the country's law. Facilities will provide at least one day off in every seven-day period, except as required to meet urgent business needs.
- Prohibition of Discrimination Facilities will employ, pay, promote, and terminate workers on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs.
- Health and Safety Facilities will provide a safe and healthy work environment. Where residential housing is provided for workers, facilities will provide safe and healthy housing.
- Freedom of Association and Collective Bargaining Facilities will recognize and respect the right of employees to exercise their lawful rights of free association and collective bargaining.
- Environment Facilities will comply with environmental rules, regulations and standards applicable to their operations, and will observe environmentally conscious practices in all locations where they operate.
- Customs Compliance Facilities will comply with applicable customs laws, and in particular, will establish and maintain programs to comply with customs laws regarding illegal transshipment of finished products.
- Security Facilities will maintain facility security procedures to guard against the introduction of non-manifested cargo into outbound shipments (i.e. drugs, explosives



- The environment is respected
- There is a policy for social accountability
- There is an anti-bribery and anti-corruption policy

biohazards and /or other contraband).

## 10.2 BSCI

In 2003, BSCI was established by the Foreign Trade Association (FTA) in order to create consistency and harmonisation for companies wanting to improve their social compliance in the global supply chain. BSCI aims to establish a common platform for the various European companies Codes of Conducts and monitoring systems, it also lays the groundwork for a common monitoring system for social compliance. The experience and the know-how gained by companies and associations from their monitoring systems were the foundations of the BSCI approach and management instruments. In 2004 the development phase was achieved, and the system has since been implemented worldwide. The goals for the BSCI code of conduct are as follows:

- Freedom of association and the right to collective bargaining are respected.
- No discrimination is practised
- Child Labour is prohibited
- Legal minimum and/or industry standard wages are paid
- Working hours are compliant with national laws and do not exceed 48 hours regular + 12 hours overtime
- There is no forced labour and disciplinary measures
- The workplace is safe and healthy



has been carried out and all products are noted with either Class 1, Class 2, Class 3 or Non.



### Pro RTX and Pro RTX High Visibility Ethical Statement

We always do things the right way at Pro RTX and Pro RTX High Visibility, which is why we only use WRAP (Worldwide Responsible Accredited Production) certified factories.

WRAP's "12 Principles" are based on accepted international workplace standards and regulations which encompass human resources management, health and safety, environmental practices, legal compliance including import/export and customs conformity, security standards and local laws.

Wrap has grown to become a global leader in social compliance. Its comprehensive inspection and certification process has made it the world's largest independent social compliance certification program for the apparel/ textile industry.

We and our global partners have a shared commitment to fair and safe working practices throughout our supply chain. We recognize our responsibility to ensure the manufacturing methods used match the ideals of those that wear and love our products.

All Pro RTX High Visibility garments with the EN ISO accreditation meet the criteria of an EU Type Examination in accordance with the Annex V of the PPE Regulation EU 2016/425. Satisfactory testing

## GF Europe Limited Environmental and Ethical Trading Policy Statements

GF Europe Limited seeks to ensure that all our activities comply fully with relevant environmental legislation and perceived best practice and strives for continual improvement of our environmental management procedures.

GF Europe Limited recognises that our activities have an impact on the environment.

In all our activities, working practices and business relationships, we are committed to protecting, conserving and enhancing all aspects of the environment over which we have control or can influence.

### Implementation

To deliver this policy, GF Europe Limited will:

- Ensure that all our activities comply with relevant environmental legislation and perceived best practice.
- Set Practical aims for the continual improvement of our environmental management procedures.
- Use resources wisely by reducing resource use and reusing or recycling materials wherever possible.
- Use Information and Communication Technology to carry out work and communicate with clients and suppliers – thus avoiding the generation of excessive volumes of paper waste.

- Recycle as much waste material as possible and minimise consumption of resources such as ink, paper, raw materials, fuel and energy.
- Maintain current and reliable information on the environmental impact of the goods and services we supply and make this available on demand to our customers to make informed choices.
- Understand the sensitivities of our customers, including the pressures of growing and changing statutory and public concern about environmental issues, and assist them in complying with environmental best practice.
- Identify opportunities to reduce any environmental impact of our activities at an early stage and adopt these changes where appropriate.
- Communicate our environmental performance both within the company and outside.
- Raise staff awareness of environmental issues and promote individual good practice.
- Require our suppliers to provide goods and services with the minimum adverse environmental impact and give preference to environmentally aware suppliers whenever possible.
- Ensure that our purchases of goods and materials comply fully with UK Government and European legislation and recognised environmental best practice.
- Make efficient and environmental use of energy, water and other natural resources.
- Take all reasonable steps to prevent pollution of both our local and wider environment.
- Employ sound waste management practices.
- Encourage all of our suppliers to have or be developing an environmental policy.
- Continue to review our environmental

performance and strive to respond to issues as they arise.

- Conduct internal environmental reviews on a periodic basis and measure our operational activities against our environmental standards.
- Encourage our staff to minimise car journeys and use environmentally sustainable transport methods in respect of commuting and business journeys wherever practical.
- Where car journeys are essential to use bio-fuels and vehicles with low carbon emissions and high fuel economy wherever possible.
- Support our local authority's green travel objectives.

### Ethical Trading Policy Statement

GF Europe will aim to trade ethically.

We will:

- Not take advantage of lower employment or manufacturing costs in developing countries.
- Adhere to any Government recognised trading sanctions.
- Actively consider paying suppliers from developing countries an additional bonus upon satisfactory completion of a project.
- Not trade with those countries which the Directors believe are violators of human rights.
- Refuse to work with any client or prospective client which we have reason to consider exploits humans, animals or the environment unfairly.

**J SHEPPARD**  
**MANAGING DIRECTOR**





## Ethical Statement

As a family business built on a strongly believed set of values, we feel that honesty, courtesy and respect are essential to all the decisions we make. We focus on creating fantastic product, thoughtfully engineered for the great outdoors and in doing so will hopefully enhance the lives of those touched by our business. We are not perfect yet, but we are striving to be committed to honesty and transparency in everything we do, every step of the way.

## Responsible Sourcing

As an Achiever level member of the ETI, we ensure workers in our partner factories are treated fairly, with good working conditions. We have inspected over 116 factories in 7 countries to ensure that 40,000 workers are covered by the ETI Base Code.

## Fashion For Global Climate Action

We are proud to have joined the UNFCCC's Fashion for Global Climate Action initiative as a signatory to the Fashion Industry Charter for Climate Action. We have committed to reduce our carbon footprint across our supply chain by selecting climate friendly and sustainable materials.

## Sustainable Product

**PFC Free Fabrics** - We use fluorocarbon free (PFC free) water repellent finishes.

**Bluesign System Partner** - This is a globally recognised independent system that verifies responsible and sustainable manufacturing of textiles.

**Responsibly Sourced Down** - 100% of our Down products are ethically sourced.

**The Microfibre Consortium** - We are at the forefront of research in finding a solution to reducing the fibre loss during production.

**The Higg Index** - Sustainable Apparel Coalition. We measure our environmental footprint through our membership of the Higg Index.

## Social Impact Programmes

We manage and fund the Regatta Group Savar School in our garment factory area in Dhaka, Bangladesh for students between the age of 4-14, some with learning and physical disabilities. We have impacted over 3000 families to date.

We provide education on health, hygiene, nutrition and finance to female workers in Bangladesh. To date, we have reached over 10,000 workers.

We are proud to have joined the UNFCCC's Fashion for Global Climate Action initiative as a signatory to the Fashion Industry Charter for Climate Action. We have committed to reduce our carbon footprint across our supply chain by selecting climate friendly and sustainable materials.

We work with Newlife the Charity for Disabled Children a leader with over 25 years of experience

in the field of sustainability and recycling. Profits from the sale of our donated items help to provide essential equipment for disabled children, medical research into birth defects and campaigning for change to support disabled children.

## Our Environment

As a member of EOCA we help support their valuable conservation projects all over the world. We are also making considerable changes to reduce our impact to the environment in our offices.

**Result®**

**SPIRO**

**Result®  
HEADWEAR**

**SAFE-GUARD**  
by **Result®**

**Result**  
**winter**  
WEAR

**Result**  
**urban**  
OUTDOOR WEAR

**Result**  
**core**  
WEAR

**ncwa**  
NATIONAL CLOTHING WASTE ASSOCIATION



cardboard we place on the market in the UK and EU can be reused.

### Ethical Statement

As a world brand, we have always taken the burden of waste seriously.

The polyester wadding in our jackets has always been spun from recycled plastic and we have always uses recycled labelling, trims and materials wherever possible.

We insist and encourage all supply partners to pursue correct environmental practices, especially the recycling of waste materials and the re-circulation of waste heat generated in the dyeing process.

We use recycled board in our cartons, oxy-degradable wrap on all our pallets and recycled wooden pallets for shipping.

Whilst our t-shirts and safety vests are packed in bulk volume printer packs to reduce packaging, we are trialling a compostable/biodegradable substitute to the recyclable polythene bags that we currently use on individual garments.

Our criteria is that these bags leave no environmental trace but will keep our garments mould, dirt and odour free during the time of their global transport, warehousing and shelf- storage so when handled by decorators, the garment remains pristine for their customers.

As an importer/exporter, we also support and pay a sizeable levy into the Packaging Waste Directive based on volumetric weight relative to what we import/export, in order that the plastic and



### Ethical Statement

Rhino Global Ltd strives to conduct business to the highest ethical and environmental standards seeking to use and utilise manufacturers that do the same. Rhino has its own detailed code of conduct, which is integral to its business and that all suppliers and their sources must adhere to.

This code of conduct is based on current best practices with regard to employment ethics, health and safety practices and environmental practices; so that when a customer purchases our goods, they know that they have been produced under acceptable conditions. That means that the goods must have been produced: -

- lawfully, through fair and honest dealing;
- without exploiting the people who made them;
- in decent working conditions;
- reducing the environmental impact during production and transportation.

It is a requirement of all those with whom we do business to demonstrate that they have in place policies with respect to: -

- Business Ethics generally;
- Education and training;

- Environmental compliance and best practice;
- Equality, diversity, non-discrimination, and prevention of harassment; and
- Health and safety.

All our first-tier suppliers and service providers are required to answer questionnaires on this subject on engagement and from time to time. They are required to show that they set similar criteria for their own suppliers and service providers. Thus, the aim is to demonstrate a commitment to good business ethics throughout the length of the supply/service provision chain.

As well as making inquiries we visit all prospective new suppliers and make our own observations, and we make regular visits to established suppliers both at home and abroad.

As part of our commitment to this policy and continual improvement of our Quality Management System we are evolving a more robust system and program for auditing compliance with ethical standards.

The following factors preclude Rhino Global Ltd dealing with a company or other entity, whether they are present within the business itself or tolerated by the regime which governs the state in which the business is situated: -

- Child labour;
- Over-long working hours;
- Over-long working week;
- Insufficient holiday;
- Insufficient breaks for refreshment and nutrition;
- No minimum wage or unacceptably low minimum wage;
- Failure to pay minimum wage;
- Forced overtime working (whether by direct

or indirect pressure);

- Lack of consideration for domestic and family matters;
- Poor treatment of sick employees;
- Unfair disciplinary procedures or lack of procedures;
- Poor working conditions (e.g. poor Health and Safety generally, overcrowding, lack of temperature control/ventilation, poor cleanliness and hygiene, lack of sanitation and facilities).

This policy will be reviewed annually as part of our Management Review procedures. All staff are invited to input. The policy is overviewed by the Managing Director.



### Human Trafficking and Modern Slavery Disclosure Statement

In compliance with the regulations of the California Transparency in Supply Chains Act (SB 657) ("CTSCA") and the UK Modern Slavery Act of 2015 ("MSA"), the following Statement discloses and updates the policies and actions of Fruit of the Loom and affiliated companies, including Fruit of the Loom, Inc.; Union Underwear Company, Inc. d/b/a Fruit of the Loom; Fruit of the Loom, Ltd.; and Russell Brands, LLC (collectively, "Fruit of the Loom" or "Company") relating to human trafficking and modern slavery in our global supply chain during 2017.

Fruit of the Loom defines human trafficking as an act of recruiting, transporting, transferring, harboring, or receiving a person through the use of force, coercion, or other means, for the purpose of exploitation. Fruit of the Loom defines modern slavery broadly to include any form of servitude, forced or compulsory labor and human trafficking.

We are committed to continuously monitor and improve the effectiveness of our prevention efforts, and will incorporate key learnings into the enhancement of our policies and practices to eliminate any form of human trafficking or modern slavery in the factories producing our family of brands.

Modern Slavery and human trafficking are complex

issues that require diligence and collaboration at all levels of our supply chain. We continue to focus on the following actions:

- 1) Gathering detailed data from existing suppliers, and in the onboarding process for new suppliers, on issues such as the use of migrant workers, the use of recruitment agencies, the level of experience required for each manufacturing process and the seasonality of production. In 2017, we collected this data from factories supplying our European markets in the process of mapping our total European supply chain;
  - 2) Filtering the data through a matrix that will identify key areas of human trafficking and forced labor risk within the supply chain;
  - 3) Enhancing our audit tool, benchmarks, and interview questions, and adding regionally-based resources to more frequently visit suppliers; and
  - 4) Targeted monitoring of higher risk suppliers based on the risk matrix.
- 5) In 2017, we also completed a risk assessment of key raw material suppliers for our Morocco manufacturing operations, which service our European markets.

### Accountability

Fruit of the Loom has a zero-tolerance policy for employees or suppliers who fail to meet Fruit of the Loom's standards for the prevention of human trafficking and modern slavery in our supply chain. If evidence of human trafficking or modern slavery is identified in our supply chain and is not immediately remedied or otherwise appropriately addressed to our satisfaction, we will terminate the business relationship with the offending party.

Out of 295 factory assessments in 2017, three findings in the area of forced labor were identified. All were the result of not having an established procedure in place at the facility to prevent human trafficking within the supply chain. We also discovered one instance of a person who was 15 years old working in a factory in a country

where the legal working age was 16. All of the findings were addressed with the factories through corrective action plans, and we continue to monitor the corrective action plans for compliance.

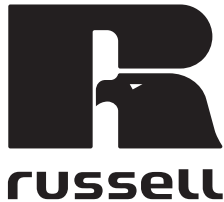
Additionally, in April 2018, we were made aware of forced labor allegations at one of our supplier factories in Malaysia during and prior to 2017. Immediately upon receipt of the notice, we commissioned an independent investigation of the allegations, which confirmed certain allegations with respect to recruitment fees paid by migrant workers and limited access to their passports. Corrective actions have been identified and committed to by the supplier and we will continue to follow up to ensure effective remediation. We will also incorporate key findings from this case into our policies and monitoring protocols with respect to modern slavery and human trafficking.

### Training

Fruit of the Loom conducts internal training on our Code of Conduct to ensure the necessary participants in supply chain management understand our commitments and requirements, including those related to human trafficking and modern slavery, with a particular focus on mitigating risks. During factory visits in 2017, we continued to raise awareness of human trafficking and modern slavery with factory management teams. All suppliers are provided with our Code of Conduct in the local language(s), are required to post the Code of Conduct in a conspicuous location and must train employees annually on its contents. Additionally, in 2017, our Corporate Social Responsibility team provided more than 150 hours of in-person training to employees and key partners covering our human trafficking and modern slavery policies.

### Factory Assessments

Our Social Compliance Assessment Program is designed to evaluate factories' compliance with our Code of Conduct. Factories that we own and operate, as well as finished goods contractors -



measures to ensure that facilities are not utilized in human trafficking and will monitor their supply chain for such practices.”

Another policy reflecting our efforts against forced labor is our prohibition of the use of cotton from Uzbekistan or Turkmenistan, which is known to be harvested by forced labor.

### **Our Business**

Fruit of the Loom is a private corporation doing business in California and in the United Kingdom. Fruit of the Loom manufactures goods in the apparel and sporting goods industries, and our applicable businesses exceed the financial thresholds which require compliance with the CTSCA and MSA.

Our supply chain is composed of factories that we own and operate, in addition to factories directly sourced by our Company or licensees that produce our family of brands.

including subcontractors directly sourced by our Company or a licensee – are typically assessed by an accredited third-party or Fruit of the Loom staff on an annual basis. Assessments are typically scheduled with factories, but we reserve the right to perform unannounced assessments at our discretion.

We have incorporated efforts to detect forced labor, including modern slavery and/or human trafficking, into our factory assessments. By acceptance of our Supplier Agreement and/or our Code of Conduct, our suppliers and licensees certify that the products supplied to us effectively comply with applicable laws regarding slavery and human trafficking of the country or countries in which they are doing business. We also provide a means for workers to report suspected violations of the Code of Conduct by phone or by email, and we strictly prohibit any retaliation against persons who report violations.

### **Policies**

Our Company’s Core Values, as well as our Code of Conduct, govern our approach to human trafficking and modern slavery. Respect for People is a critical element of these governing documents that define the culture of our employees and contractors in offices, distribution centers and factories alike. Our Code of Conduct includes the following provision regarding human trafficking and modern slavery:

“Suppliers will not use forced labor, including, but not limited to, prison labor, indentured or slave labor, or bonded labor. Suppliers will adopt



## Ethical Statement

### 1. INTRODUCTION AND PURPOSE

Hultafors Group AB develops, manufacture, market and sell products under the brands of Hultafors, Fisco, Snickers Workwear, PUVAB, Wibe Ladders, Solid Gear, Toe guard, Dunderdon and Eripio Wear. This Code of Conduct is valid, but not limited to, business conducted with these brands.

For Hultafors Group it is important to take responsibility, this Group wide Code of Conduct is developed in order to set up minimum requirements and define standards for fair, safe and healthy working conditions and environmental responsibility throughout our supply chain.

### 2. SCOPE OF APPLICATION

This Code of Conduct is developed to provide a non-negotiable requirement that apply to the whole supply chain of a Hultafors Group product - all our self-owned factories, suppliers, approved subcontractors, sub-supplier and other parties involved in the production process delivering material or components that are used in or for our products. (Onwards in this document referred to as "suppliers"). It is the responsibility of the supplier to inform and secure compliance of this Code of Conduct from all involved parties in the supply chain that Hultafors Group do not have direct contact with.

Standards equally apply to permanent, temporary, and agency workers, as well as piece-rate, salaried, hourly paid, legal young workers (minors), part time, night, and migrant workers. (Onwards in this document referred to as "employees")

The Hultafors Group Code of Conduct is a foundation for our business relationship and is therefore an integral component of how sourcing strategies and factory performance evaluation is approached and also determines which factories Hultafors Group will continue to engage and grow business with. Hultafors Group expect all suppliers to make improvements when any of these Code of Conduct standards are not met and to develop internal strategies to ensure an ongoing compliance. Timeline for achieving compliance shall be reasonable and be clearly defined in an action plan presented to Hultafors Group.

Providing proof of correction to Hultafors Group for each non-compliance is also required. Please also refer to paragraph 15 in this document.

Hultafors Group reserves the right to amend or modify the Code of Conduct at any time and will inform suppliers if this is done.

### 3. REFERENCE DOCUMENTS AND STANDARDS

Hultafors Group's Code of Conduct is based on the below current international reference documents and standards:

- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights to Work
- The UN Global Compact
- The Rio Declaration on Environment and Development
- The UN Convention against Corruption
- The UN Convention of the Rights of the Child
- The European Convention for the Protection of animals kept for Farming Purposes
- The European Convention for the Protection of Animals during International Transport and the Council Regulation on the protection of

animals during transport

- The Conflict Mineral Regulation

### 4. LEGAL REQUIREMENTS

Hultafors Group general rule is that all suppliers must comply with relevant and national laws in the country in which they are operating. Should any of the requirements in our Code of Conduct be in violation of the national laws, the law in that country take precedence over the Hultafors Group Code of Conduct. Hultafors Group must be notified immediately in any such case in order to decide on how to proceed.

It is important to understand that requirements of Hultafors Group may not be limited to what is set forward by national law. When legal requirements are less strict than this Code it is always Hultafors Group Code of Conduct that applies, supplier shall apply the highest standards at all times.

### 5. HUMAN RIGHTS AND LABOUR STANDARDS

Hultafors Group support and respect the protection of internationally proclaimed Human rights, one of the purposes with this Code of Conduct is to make sure that we are not complicit in human rights abuses.

Every employee shall be treated with respect and dignity and Hultafors Group expect the suppliers to respect the rights of each individual and prohibit any type of violence, abuse and assault at the workplace.

The employees shall be free to lodge complaints with their superior.

Under no circumstance does Hultafors Group accept that our suppliers use corporal punishment or humiliation or any other type of mental or physical disciplinary action, nor shall there be any threat of such treatment.

#### 5.1 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

All Hultafors Group suppliers shall recognize



the right of all employees to form and join trade unions, or similar associations of their own choosing, and bargain collectively (ILO Convention 87 & 98). In situations where freedom of association and collective bargaining is restricted under national law the supplier should facilitate parallel means of independent and free association and bargaining for all employees.

Disciplinary or discriminatory actions from the supplier against employees who join an association or by other means organize themselves are not accepted.

## 5.2 FORCED LABOUR

Hultafors Group do not accept any form of forced or compulsory, bonded, or any other type of labour that is considered illegal in the production of our goods. Employees shall be free to leave their employment after reasonable notice as required by national law or contract.

There shall be no restriction to the employees' rights to leave the workplace

Supplier shall not retain employee's deposits, identity papers, passports or work permits as a condition of employment.

Any commission or other fees to recruitment agencies in connection with employment of foreign, migrant or temporary employees should be covered by the employer.

## 5.3 CHILD LABOUR

The age for admission to employment shall be no

less than the age of completion of compulsory schooling and, in any case, not less than 15 years as covered by article 2.3 in the ILO convention no 138.

If the minimum employment age in the country where the supplier performs its business is higher than 15 years, then the supplier must adhere to the national laws and regulations.

Children, in the age of 15-18 years, shall not perform hazardous work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety or morals. Limits for working hours and overtime for this age group shall be set with special consideration to the employees age.

Hultafors Groups posture is that there shall be no child labour - If a child is found working at the supplier's plant or else be engaged in the conduct of business whether at the factory or not, Hultafors Group will demand that the supplier takes immediate and effective measures in the child's best interest. Hultafors

Group will together with the supplier seek to find a satisfactory solution taking into consideration the child's age, social situation and education. Hultafors Group will not ask a supplier to dismiss a child without first discussing the child's future. Any measures taken shall always aim to improve not worsen the individual situation for the child. Any cost for education etc. must be covered by the supplier.

## 5.4 ELIMINATION OF DISCRIMINATION

No employee shall be discriminated based on race, gender, national origin, ethnicity, political opinion, social group, religion, age, sexual orientation, marital status, health, disability or other classes protected by law. (ILO convention 100 & 111)

All employees possessing the same qualification and experience shall receive equal conditions during employment including hiring, compensation, advancement, termination or retirement.

Dismissal of pregnant female employees during parental leave or following their return to work

is not acceptable when no legal reason can be proven. Employees taking parental leave shall be entitled to return to their employment on the same terms and conditions as they had prior taking leave.

## 6. EMPLOYMENT CONDITIONS

All employees shall be entitled to a written contract in their own language, that clearly state the terms and conditions of the employment including wages, benefits and working conditions. Hultafors Group expect our suppliers to ensure the employees are aware of their legal rights and obligations.

### 6.1 WORKING HOURS

Hultafors Group expect our suppliers to comply with the maximum number of regulated working hours stipulated in the local laws in the country where the supplier performs its business. This limit should not exceed 48 hours a week as stated in the ILO convention no 1. In exceptional circumstances as covered by article 2 in the ILO convention no. 1 the limit of 48 hours can be extended.

Overtime must always be voluntary and compensated in accordance with applicable law. Overtime should not be requested on a regular basis. The overtime hours shall not exceed the numbers allowed by the national law. The total sum of regular working hours and overtime should not exceed 60 hours a week unless very exceptional circumstances. Overtime shall always be compensated at a premium rate.

Employees must be entitled to at least one-day (24 consecutive hours) rest in every 7-day period. (ILO convention no 1). The employee shall be granted their stipulated annual leave, sick leave or maternity/paternity leave in case of pregnancy.

### 6.2 WAGES

Wages and benefits shall meet at least legal or industry minimum standards and always be sufficient to meet basic needs of employees and





their families and provide some discretionary income. Minimum wage is a minimum requirement but not a recommended level. Whenever the legal or industry minimum are not sufficient to meet the basic needs, Hultafors Group encourage suppliers to provide adequate compensation to their employees in order for these needs to be met.

Wages must be paid regularly, on time and in full directly to the employee and be fair considering the employees qualifications, experience and performance. Hultafors Group do not accept any deduction from wages as a disciplinary measure nor any other deduction not provided for by national law.

Deductions provided for by national law should never constitute an amount that will lead the employee to receive less than the minimum wage.

Working relationships shall be legally binding, and all obligations to employees under national labour or social security laws and regulations shall be respected.

### **6.3 PREGNANT EMPLOYEES AND NEW MOTHERS**

Hultafors Group suppliers shall abide protective provisions benefiting pregnant employees and new mothers including temporary reassignments away from work tasks or working environment that may pose a risk of health of the pregnant woman and their unborn children even if such measures are not stipulated by local law. Hultafors Group recommend suppliers to make temporary adjustments of working hours during and after pregnancy.

Hultafors Group also recommend that suppliers with female employees arrange day care for children below school age in developing countries and in case this is offered it is a recommendation to also provide new mothers with breast-feeding breaks and facilities.

## **7. WORKING CONDITIONS**

Hultafors Group requires from its supplier that the safety and health of the employees shall be a priority at all times. A safe and hygienic working environment shall be provided to prevent accidents or injuries arising from or occurring in the course of work. Hultafors Group expect suppliers to take responsibility for the health and safety for their employees, control hazards and take best possible precautionary measures against work-related accidents and diseases.

No hazardous or unsafe equipment is accepted. It is of vital importance that the supplier makes risk assessments for all working tasks, give the employees sufficient training and information of how to best protect themselves from injuries in the course of work. Supplier shall, free of charge, provide the employee with the correct personal protective clothing and equipment (PPE) to all employees in any harmful or potential risk work areas(s). The supplier shall educate the employees in the importance of the use of the PPE on a regular basis.

### **7.1 BUILDING AND FIRE SAFETY**

No unsafe buildings are accepted. All buildings shall be safe, maintained and checked regularly – this is

valid in the factory premises, office area, living and dining and recreational facilities.

Emergency exits should be clearly marked and be available on all floors, there shall be minimum one emergency exit on all floors. Planning and placement of emergency exits must be in line with number of employees and layout of the factory to facilitate

swift evacuation. All exit doors shall open outwards. Exits must not be blocked by any item and shall be well lit. If emergency exits are locked the keys shall be available at all times to the employees, for example placed behind breakable glass next to the doors.

All employees shall be aware of the safety arrangements in the factory, such as knowledge about the whereabouts of the emergency exits, fire extinguisher, first aid equipment etc. An evacuation plan shall be displayed on each floor in the factory and the fire alarm tested regularly. Evacuation drills shall be performed at least once a year. (Following ILO Convention 155).

### **7.2 FACTORY CONDITIONS**

It is important for the employee's well-being that the factory environment is clean and free from pollution.

The temperature and noise level in the factory must be tolerable as a working environment and the ventilation must be sufficient. When the noise level exceeds 85 dB in average over the working day, or maximum 115 dB as a single noise, the supplier shall make sure that the employees use hearing protection. Heaters or fans should be provided when needed. The lighting must be sufficient for the work that is performed at each work station at all times during the working day.

Sanitary facilities must be clean and employees shall have access without restrictions. The number of sanitary facilities must be adequate for the number of employees at the premises and preferably be placed on each factory floor in case there are more than one floor. Sanitary facilities shall preferably be separated for men and women. Drinkable water must be available at all times and the employees shall have access without restrictions.

### **7.3 FIRST AID AND INSURANCE**

First aid equipment must be available at each factory and at least one person in each department



must have training in basic first aid. The employer shall provide accident insurance covering medical treatment for work related accidents to all employees. Should stricter national legal demands or local agreements exist, these demands apply.

It is recommended that a doctor or nurse is available at short notice in case of an accident at the factory.

## 7.4 HOUSING

If dormitories are available for the employees, Hultafors Group require that the same conditions in terms of safety and health as specified in 7.1 & 7.2 should be applied. All employees must be provided their own bed and the living space per employee must meet the minimum legal requirement. Separate dormitories as well as toilets and bathrooms must be provided for men and women. There shall be no restrictions for employees to leave the dormitory.

## 8. ANTI-CORRUPTION

Hultafors Group follows a zero-tolerance policy for all forms of corruption including extortion, embezzlement and bribery. Hultafors Group will not accept any type of corruption related to our business and we expect all our suppliers, employees and partners in the supply-chain to embrace this policy.

## 9. ENVIRONMENTAL STANDARDS

Hultafors Group suppliers shall comply with all applicable environmental laws and regulations in the country of operation, we also expect our suppliers to make every effort to reduce the environmental impact by adopting best practice principles in terms of environmental management. We expect our suppliers to continuously seek improved methods and to have a precautionary approach to environmental challenges as prevention is better than remediation, this view on the matter will lead to continuous improvement which is key for a successful environmental management.

### 9.1 CHEMICALS

All Hultafors Group suppliers must comply to our Restricted Substance List (RSL) confirming that no prohibited chemical substances are used in the production.

Hultafors Group require that all suppliers shall establish and maintain a list of all chemicals used in production and maintenance, including the chemical name of the product, the purpose of use and a reference to a Material Safety Data Sheet (MSDS). Suppliers shall have valid MSDS for all chemicals used in production and maintenance.

Hultafors Group suppliers shall have a written procedure for storage, handling and use of chemicals. The procedure shall specify who is responsible to ensure that proper procedure for handling chemicals is maintained and followed.

Hultafors Group supplier shall ensure that containers of chemicals – including temporary containers – are properly labelled according to Globally Harmonized System of Classification and Labelling of chemicals

(GHS) / Classification and Labelling and Packing of Chemicals (CLP) system to ensure the contents are known and potential risk is minimized.

Hultafors Group supplier must make sure that all employees that handle chemicals have the sufficient competence to do so and are adequately trained. Records from training should be kept at the supplier.

### 9.2 EMISSIONS AND WASTE

Hultafors Group supplier shall ensure compliance with all applicable laws and regulations pertaining to air, water and noise pollution as well as ground contamination and if required obtain the necessary permits and be able to demonstrate compliance with these permits.

Hultafors Group supplier shall take all precautionary steps to prevent chemicals to leak to air, ground and water and shall dispose chemicals in compliance with legal regulations. Hazardous waste must be monitored and minimized.

Air emissions generated from operations are to be characterized, monitored, controlled and treated as required as per legal regulations prior to discharge or disposal.

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required as per legal regulations prior to discharge or disposal.

In this area it is important for the supplier to continuously seek improved methods as in this aspect it is obvious that prevention is far better than remediation from an environmental point of view. Effluent treatment plants shall be appropriate for the type of effluents generated and they must be properly operated, used and maintained.

Energy usage shall be monitored and whenever possible, Hultafors Group recommend using renewable energy.

### 9.3 WATER

As fresh water becomes scarcer, the importance of how it is managed grows. Water usage shall be monitored and minimized and Hultafors Group recommend using recycled water in order to reduce the total volume of usage. Closed systems are to prefer whenever possible to minimize the water use.

## 10. CONFLICT MINERALS



Hultafors Group supplier must adhere to the Conflict Mineral Regulation. This regulation concerns the trade in four minerals – tin, tantalum, tungsten and gold – which sometimes finance armed conflict or the use of forced labour in the mines.

Hultafors Group is committed to ensure the health, safety and protection of people who come in contact with our products and business, and we require high social, environmental and human rights standards among our suppliers. Managing our obligations in relation to Conflict Mineral Regulation is a part of our corporate responsibility. Supplier need to make sure that in case any of the conflict minerals is used in or for the production for a Hultafors Group product they need to be responsibly sourced and proof of origin presented.

## 11. CE MARKING

CE marking indicates conformity with health, safety, and environmental protection standards for products sold within the European Economic Area (EEA). The design and development of product need to be in conformity with the applicable EC directives and regulations and the specific requirements are stated by Hultafors Group. Therefore, it is of outmost importance that any Hultafors Group supplier providing CE marked products acknowledge the importance of following given instruction in order for the product to be produced in compliance with the enforced legislations. Any supplier providing CE marked products need to refer to the purchase agreement for the correct CE standard as the requirements differ depending on product group.

## 12. ANIMAL WELFARE

Animals should never be subjected to harsh or cruel treatment in the course of producing items for Hultafors Group – every person has a moral obligation to respect all animals and to have due consideration for their capacity for suffering. Animals shall be treated in accordance with the “European Convention for the protection of animals kept for farming purposes”. Taking the lives of animals must always be conducted in the least painful, quickest and non-traumatic method available. Products from animals that are not intended for human consumption are generally not used in Hultafors Group products.

Hultafors Group do not accept:

- Practice of Sheep Mulesing
- Real Fur in any Hultafors Group product
- Products from animals that has been slaughtered without stunning

### 12.1 WOOL

Hultafors Group do not accept the practice of Mulesing and therefore require documented proof from our wool suppliers that Merino Wool used in or for our products are sourced from non-mulesing practicing sources. Any certificate must be up to date and valid for the wool delivered to Hultafors Group. Hultafors Group value traceable sourcing why suppliers that offer these possibilities will be used when possibility is given.

### 12.2 LEATHER

Hultafors Group premieres traceable sourcing of leatherware to increase knowledge of the source of hides at traders and the chemical process in the tanneries. All suppliers of leatherware should implement a high sustainable level making sure that the tanneries and traders that produce and deliver hides has optimized the processes in terms of chemicals and water use during tanning process. Best practice process should be applied at all

levels of production. Vegetable tanned leather is preferred (when the requirement of the leather gives the possibility) why suppliers that offer this will be used when possible.

## 13. QUALITY

In order to keep and maintain high quality output Hultafors Group strongly recommend that a quality policy is implemented at the supplier and that there are documented quality goals in place. There should be a system to handle discrepancies and deviations. When a discrepancy or a deviation occurs, there should be clear processes how to manage and improve such occurrence.

Hultafors recommend suppliers to implement ISO 9001 or similar as it will give the needed systematic approach to quality management.

## 14. ASSESSMENT AUDIT AND MONITORING

Hultafors Group or its third-party representative reserves the right to make unannounced visits to all suppliers to monitor compliance with this Code of Conduct, at any time. However, these inspections shall only take place in accordance with the applicable laws and without compromising on the business activity of the supplier.

During audits Hultafors Group or its representative requires access to all documents and areas and to all employees for confidential interviews. Hultafors Group ensures that personal data is handled in accordance with applicable legal guidelines on the protection of personal information.

In order to enhance the transparency within the supply chain in relation to sustainability and compliance with this Code of Conduct Hultafors Group is working with a Supplier Relationship Management SaaS (Software-as-a-service) solution to perform supplier self-assessments. Hultafors Group ask of you as a supplier to take part and co-operate in the self-assessment questionnaires without delay.

If an audit or the self-assessment reveals less



than full compliance with this Code of Conduct a corrective action plan need to be made and full responsibility needs to be taken by the supplier for ensuring that this plan is implemented according to the defined time plan.

#### 15. NON-COMPLIANCE

Should Hultafors Group find that a supplier does not comply with this Code of Conduct we will terminate our business relationship with this supplier in case the supplier does not follow corrective steps within a suitable and agreed time limit. Significant breaches of the Code of Conduct will not be accepted and lead to immediate termination of business relationship with Hultafors Group.

#### 16. COMPLIANCE COMMITMENT WITH HULTAFORS GROUP CODE OF CONDUCT

By signing this document, the supplier acknowledge that all production made for Hultafors Group are produced in compliance with this Code of Conduct. The supplier takes full responsibility for the implementation of these standards in their organization and to inform all their employees about the principles in this Code of Conduct.

General Data Protection Regulation (GDPR) needs to be taken in account in case private data regarding any EU citizen is collected – <https://www.eugdpr.org>

Compliance commitment on Hultafors Group Code of Conduct:

We the undersigned hereby confirm that:

- We have taken due note of Hultafors Group Code of Conduct
- We will adopt and adhere to the Hultafors Group Code of Conduct in its entirety without amendment.
- We will take full responsibility for the implementations of these standards in our company

# STANLEY/STELLA



## OUR MATERIALS AND ENVIRONMENTAL CERTIFICATIONS

We favour organic or recycled materials that care for your skin and the environment. Our entire production chain benefits from the strictest environmental certifications and labels in the market.

### ORGANIC COTTON

Stanley/Stella never uses standard cotton. Most of our clothing is made from 100% organic cotton.

Organic cotton is a natural, GMO-free fibre that uses less water than standard cotton. In addition, its production does not involve the use of chemicals (no fertilisers or pesticides) and encourages rotation of crops to keep soil healthier, more fertile and maintain humidity. Waste from the cotton ginning process is also recycled for the animal feed industry.

### OUR GOTS CERTIFICATION: 4 LETTERS THAT CHANGE EVERYTHING

GOTS is the Global Organic Textile Standard label. The strictest certification for textiles made from organic fibres. GOTS tracks the entire chain of production from farm to factory: from harvesting of the cotton, weaving of fibres, assembly of items, to the final product before printing, including even the export of our clothing! It certifies that Stanley/Stella cotton is GMO-free and is grown

without the use of chemicals and is processed and dyed without using any banned toxic substances.

GOTS also ensures compliance with the labour standards of the International Labour Organisation throughout the chain of production.

### TENCEL® AND MODAL®

Tencel® and Modal® are biodegradable and made from eucalyptus or beech tree pulp. Eucalyptus is known for being a fast-growing wood that does not require irrigation. The Tencel manufacturing process has received the “European Award for the Environment” from the European Union due to its low emissions.

Our cellulose fibres are sourced exclusively from the Austrian manufacturer Lenzing, the first fibre manufacturer to have received the EU Ecolabel, which promotes environmental excellence.

### LINEN

Linen is a tough natural fibre that is extremely “eco-friendly”. It can be grown without the use of either chemicals or irrigation. Natural precipitation is all that it requires. In addition, each plant also absorbs a large quantity of carbon.

### RECYCLED POLYESTER

Stanley/Stella uses recycled polyester to make its windcheater jackets and as a complement (up to 15%) to organic cotton in some of our sweatshirts.

One windcheater jacket enables the recycling of between 7 and 8 PET plastic bottles. And to ensure that our sweatshirts are nice and soft against your skin, it is never in direct contact with the polyester, which is sandwiched between two layers of organic cotton.

### OUR GRS CERTIFICATION: WE ARE RECYCLABLE!

The Global Recycled Standard label certifies that the materials used are recycled: in the case of

polyester, from plastic bottles, and for cotton, from cutting waste. GRS also guarantees compliance with social and environmental criteria such as treatment of wastewater, the absence of certain toxic additives and respect for working conditions in our partner factories.

### RECYCLED COTTON

The cutting of different pieces to make our products naturally produces scrap material. Since the idea of throwing this material away is out of the question, we have a partner who collects and recycles it into new cotton thread that we use in the manufacture of our tote bags.

### OEKO-TEX: TRUST YOUR CLOTHES WITH YOUR EYES CLOSED!

You can't buy trust. It has to be earned. OEKO-TEX Standard 100 certifies the absence of harmful chemical substances in all Stanley/Stella products thanks to the “Confidence in textile” label. An independent testing and certification system that ensures that all raw, semi-finished and finished textile products are processed in a way that prioritises:

- The precautionary principle, which prohibits certain potentially harmful substances even where they are not (yet) legally banned
- The absence of chemical substances that are harmful to health and the environment
- A restriction on the lead content of dyes

### PETA CERTIFICATION

We are also proud to announce that Stanley/Stella is PETA certified. This means that we do not conduct or commission any animal tests on ingredients, formulations, or finished products and pledge never to do so. On top of this, our apparel is made from 100% vegan materials so you can be confident that no harm came to anyone during its creation.



### Ethical Statement

STORMTECH realise that we need to take responsibility for our world. Not only do they comply with all applicable environmental regulations and laws in the countries of production, but have gone a step further to create their own ethical production code.

The STORMTECH OurWorld Production Code ensures that no materials used in the production of STORMTECH gear contain any substances that are harmful to the environment.

Requirements are detailed for production facilities in the areas of air, water, and noise pollution, as well as recycling in order to minimise the impact they have on their surroundings.

Every production facility used by STORMTECH provides their consent to upholding this code. Before doing business with any third party manufacturer STORMTECH visit their facility to see first-hand if they can meet their environmental standards. The requirements of this code illustrates their support of the International Standard

Organisation's 14000 series of environmental standards, as well as other key international environmental initiatives.

STORMTECH are committed to protecting our world and conserving its natural resources. It's a healthy choice for the planet, and for the consumer who wears STORMTECH Performance Apparel.



## Carbon Management Plan

### Overview

SDL Group Ltd is firmly committed to reducing its environmental impact, resource use and operating costs. We have adopted a range of policies and working practices which have helped us to become a more sustainable business, including the adoption of a target to reduce the Group's carbon footprint (homes, offices and travel) by 20% between 2011 and 2021.

This Carbon Management Plan (CMP) is focused on the emissions for which we have direct operational responsibility – energy consumption at offices, fleet vehicles; company cars and privately owned vehicles used for business purposes. Waste management, water, commuting and our supply chain. We are implementing carbon reduction projects in these areas, albeit outside the CMP framework.

By following this process, we have been able to establish more accurately the level and scope of our carbon emissions, and to identify the areas where we can have the greatest impact in reducing them. The majority of the projects outlined in the CMP are new, and entail both high and low cost measures. Some existing initiatives are also included, but now have more ambitious carbon reduction targets as a result of their incorporation into the CMP, for example our programme of

office rationalisation.

### Carbon Commitment

- Carbon management will be central to the way we provide services and run our business
- We will invest time and money in practical measures which reduce our carbon footprint
- Every member of staff will be involved in our carbon reduction programme
- We will support our customers and partners in their own carbon reduction efforts.

### The Plan

This Plan sets out a 10 year programme of action designed to reduce our carbon emissions by 20% by 31 March 2021. We are focused on four areas:

#### Buildings:

reduced energy consumption in warehouse and offices.

#### Travel:

lower carbon vehicles and improved journey management.

#### Cultural change:

communication, awareness raising, training and policy development

#### Information management:

efficient and systematic monitoring of all energy usage.

## Environmental / Sustainability Policy Statement

### Our Commitment:

At SDL Group Limited we are committed to managing our operations and services in a

way that is environmentally sustainable and economically feasible.

As a responsible organisation we will endeavour to comply with all applicable environmental legal and other requirements that apply to our activities, products and services.

We are committed to the implementation, maintenance and enhancement of the SDL Group Environmental Management System in order to deliver continual improvement in our environmental performance.

### Policy Scope:

This policy applies to all activities of the SDL Group Limited incorporating the trading brands of 'Surridge Sport', 'Incentives UK' and 'SDL Trophy'.

All of our factories comply with this policy.

### Our Objectives:

SDL Group Limited, subject to sound business practice and economic practicality, is committed to achieving the following environmental objectives:

- Identifying and reducing waste streams arising from our operations and disposing of waste in a way that minimises harm to the environment
- Reducing consumption of fuel, water and energy wherever possible.
- Provide awareness training and where required job specific training for employees on environmental issues.
- Encourage suppliers and subcontractors to introduce programmes which support our environmental objectives and targets, where their activities have a significant impact on the environment.
- Source and promote a product range to minimise the environmental impact of both production and distribution.
- Meet or exceed all the environmental legislation that relates to the Company.



- Setting, monitoring and reviewing our environmental targets.
- Considering environmental issues when making new investments.

#### **Policy Control and Review:**

The SDL Environmental Management System will be reviewed at least annually and revised taking into consideration any legal changes, improvements in technology or the needs of the company.

#### **Waste Management Policy**

SDL Group Ltd is proud of our green site and our Environmental Policy states that we will strive "To prevent all kinds of pollution through reduced waste, reduced emissions and responsible disposal".

Our Waste Management Policy builds on this objective; setting ambitious targets to achieve a 7% reduction in overall waste production by 2020.

The company will achieve this by:

- Reviewing our purchasing practices with a view to minimising waste;
- Advising staff on the waste hierarchy (reduce, reuse, recycle) and providing guidance on waste reduction techniques and reuse/recycling facilities;

- Providing adequate recycling facilities around the site;
- Ensuring that waste is stored appropriately, safely and in line with legislation;
- Ensuring that waste is disposed of responsibly and in line with legislation;
- Providing waste management training where necessary;
- Monitoring and reviewing waste streams, practices and reduction targets regularly;
- Requesting waste minimisation and recycling information in line with targets in future waste management contracts;
- Working with contractors and partners to ensure this policy is implemented across site.

The policy will be implemented, monitored and reviewed by senior management.





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### **Ethical Statement**

TheMagicTouch (G.B.) Limited was formed in 1992 to manufacture and distribute a range of transfer papers and associated products for the image transfer process.

The company has always adopted a strong commitment to ensure that all suppliers support a high ethical and health and safety standards in all practices.

The transfer papers are produced in the UK, Germany and Japan where all operators are highly skilled to ensure consistent quality control on all products.

All employees involved in production are paid well in excess of the respective countries minimum wages.

At no stage in either the production or distribution of the transfer papers is there any involvement of child or forced labour.

TheMagicTouch transfer papers do not involve the use of any toxic or solvent based products helping to reduce the impact on the environment.



### Ethical Statement

At TriDri® we care as much about our ethical performance as we do about the performance of our sportswear.

Like every sports professional, we avoid harmful, banned or restricted chemicals that may be unsafe and abide by the OEKO-TEX® STANDARD 100. This provides the ultimate reassurance that our kit has been tested by independent experts and contains nothing on the restricted substance list of Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulations or the ECHA SVHC Candidate List. TriDri® sportswear also meets EU general product safety directive regulations as no harmful substances, dyes or colourants are used during our manufacturing processes.

We also have an excellent track record when it comes to social compliance. We adhere to the labour principles set out in the amfori BSCI Code of Conduct. This means we adopt a 'fair play' approach to selecting our factories. Not only must they achieve high standards and respect workers' rights, they must also offer decent working hours. Maintaining these standards ensures all the kit in our locker has been produced in a fair, honest and legal way, without exploiting the people who make it.

### Plastic Use Statement

We need to protect our clothing on its journey from factory to end user, this means that a certain level of packaging is required to prevent soiling or damage during transit.

Our products are individually presented in plastic bags. The type of plastic used here is Low Density Polyethylene and, on the bags, you will see this recycling symbol.

Polyethylene can be melted to a liquid form and reshaped or extruded as it solidifies, making it reusable. Recycling polyethylene not only helps the environment but can be another form of extra income. For more information about this, search on the web under "Buy my polyethylene plastic."

Whilst recognising that packaging is inevitable in our industry, we want to demonstrate how we've cut down on the materials used and improved the recyclability of these materials, so the environmental impact is kept to an absolute minimum.

As a brand we have reduced and removed where we can any unnecessary packaging throughout our supply chain and carry this ethos forward into our daily working lives. In our head office we have recycling points for toner cartridges, cardboard, paper and polyethylene plastic. Going forward we plan to use biodegradable packaging when sending any samples through our suppliers to customers.

As well as working to improve our eco-footprint within our packaging we are also taking steps to look for more sustainable materials to use within our products. An initial example of this is our use of DuPont™ Sorona® a renewably sourced fibre that is highly sustainable and used as filling within our padded jackets.



## Overview

Yoko International Limited believes that it is important to behave in a socially and ethically exemplary way. The company recognises its responsibilities towards the people who take part in the production and support of our products and services worldwide, and believes that they should be treated fairly and their human rights respected at all times.

The company also recognises the need to retain a set of core values in doing business. The reputation of the company, and the trust and confidence of those with whom it deals, are among its most vital resources, and the protection of these is of fundamental importance. The company demands and maintains high ethical standards in its business dealings, and corrupt practices are not tolerated.

Yoko International takes the above principles extremely seriously. A Board Director has been appointed to oversee social and ethical matters; this policy is intended to make our position clear to staff, customers, suppliers and any other interested parties.

## Relations with customers

- a) The company believes that integrity in dealings with customers is essential for successful long-term business relationships. This principle should govern the company's approach to customers at all times.
- b) All advertising and sales literature must avoid untruths, concealment and overstatements of any kind whatsoever.
- c) Employees must not give to or accept from customers any money or gifts of significant value

which could be construed as intended as a bribe.

- d) Confidential information obtained from customers will be treated with the same care accorded to the company's own confidential information.

## Relations with suppliers

- a) The company aims to develop relationships with its suppliers based on mutual trust.
- b) The company undertakes to pay its suppliers according to agreed terms of trade.
- c) Employees must not solicit gifts or favours from suppliers. Small tokens and hospitality may be accepted, providing they do not place the recipient under any obligation and cannot be misconstrued. Money gifts must not be accepted.
- d) Any offers of gifts or favours of unusual size or questionable purpose must be reported to the Company Secretary.

## Relations with competitors

- a) The company will compete for business in a vigorous but honest manner.
- b) The company will not seek to damage competitors' reputations, directly or by innuendo.
- c) The company believes that the best way to enhance its reputation is by providing quality products and services. Fair comparisons with competitors may be made, but derogatory comments and "negative selling" are not tolerated.

## International Business

- a) The company and its employees will respect the traditions and cultures of each country in which it operates.
- b) The company will obey the laws of the land in the countries in which it does business.
- c) The company advocates and endorses the fundamental conventions of the International Labour Organisation.

- d) The company does not employ child labour in its own operations, and will not support or trade with suppliers who do so.

- e) The company will seek to support businesses or organizations with a positive attitude towards fair trade and labour rights in their own operations and their supply chains in developing countries.

- f) The company will not support or trade with organizations whose activities include irresponsible marketing practices (including marketing to children), inappropriate financial trading or the production or sale of tobacco products.

## Employees' Rights

- a) Anyone who works directly or indirectly for Yoko International should be entitled to his or her basic human rights.
- b) Where workers are employed on a contract basis, they should not be required to remain in employment against their will. The employer covers all commissions and recruiting fees in such cases.
- c) The company takes its responsibilities as an employer seriously, and will comply with all the provisions of local employment law and health and safety regulations.
- d) Yoko International is an Equal Opportunities employer. Discrimination or harassment on grounds of race, gender, age or sexual orientation will not be tolerated.

## Human Rights

The company will not provide support to or supply

- a) Businesses which disregard basic human rights within their sphere of influence
- b) Businesses with links to oppressive regimes, or engaged in supplying armaments or other equipment to such regimes for use in the violation of basic human rights.



### **Enviromental Issues**

The company recognises that the environment is of increasing concern globally, and expects its suppliers to comply with applicable environmental laws and regulations.

The company actively seeks ways of minimizing the ecological impact of its own activities, and will actively support other organizations involved in

- a) Recycling
- b) Renewable energy
- c) Sustainable natural products
- d) The pursuit of ecological sustainability

