



































OUR BRANDS  
**ETHICAL POLICIES**

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# SUPPLIER INITIATIVES

A large number of our suppliers adhere to several internationally recognised guidelines to ensure the ethical and social impacts of their actions are accounted for. Further insight into such initiatives are shown below:



## [www.ethicaltrade.org](http://www.ethicaltrade.org)

The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe. Our vision is a world where all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security and equity.

### What is ethical trade?

Ethical trade means that retailers, brands and their suppliers take responsibility for improving the working conditions of the people who make the products they sell. Most of these workers are employed by supplier companies around the world, many of them based in poor countries where laws designed to protect workers' rights are inadequate or not enforced.

Companies with a commitment to ethical trade adopt a code of labour practice that they expect all their suppliers to work towards. Such codes address issues like wages, hours of work, health and safety and the right to join free trade unions.

### Brands

Alexandra	Brook Taverner	Craghoppers
Glenmuir	Premier	
Regatta Activewear	Regatta Originals	
Regatta Classics	Regatta Professional	
Regatta Hardwear	Regatta Standout	
Regatta Junior	Regatta Xpro	



## [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.

### Brands

adidas	Callaway	Ogio
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## [www.fairtrade.org.uk](http://www.fairtrade.org.uk)

Fairtrade is about better prices, decent working conditions and fair terms of trade for farmers and workers. Fairtrade supports small scale farmers and workers who are marginalised from trade in a variety of ways.

We work with government, parliament, business, civil society and other stakeholders to advocate for policies that will make trade fair.

### Brands

Premier



## [www.global-standard.org](http://www.global-standard.org)

The Global Organic Textile Standard (GOTS) was developed through collaboration by leading standard setters with the aim of defining requirements that are recognised world-wide and that ensure the organic status of textiles from harvesting of the raw materials through environmentally and socially responsible manufacturing all the way to labelling in order to provide credible assurance to the consumer.

Since its introduction in 2006 the Global Organic Textile Standard has already demonstrated its practical feasibility. Supported by the growth in consumption of organic fibres and by the remarkable demand for unified processing criteria from the industry and retail sector, it has gained universal recognition, enabling processors and manufacturers to supply their organic textiles with one certification accepted in all major markets. With the introduction of the logo and labelling system the GOTS is already visible not only on the shelves of natural textile shops but large-scale retailers and brand dealers as well. This is a milestone in consumer recognition and a strong acknowledgement of our reliable quality assurance concept.

### Brands

Babybugz	Maderia
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## [www.sa-intl.org](http://www.sa-intl.org)

The SA8000® Standard is the leading social certification standard for factories and organizations across the

globe. It was established by Social Accountability International in 1997 as a multi-stakeholder initiative. Over the years, the Standard has evolved into an overall framework that helps certified organizations demonstrate their dedication to the fair treatment of workers across industries and in any country.

SA8000 measures social performance in eight areas important to social accountability in workplaces, anchored by a management system element that drives continuous improvement in all areas of the Standard. It is appreciated by brands and industry leaders for its rigorous approach to ensuring the highest quality of social compliance in their supply chains, all the while without sacrificing business interests.

#### Brands

Babybugz Denny



#### 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.

#### Brands

Babybugz



#### www.soilassociation.org

This scheme verifies that a product has met organic standards throughout its journey – from raw material to finished product. When we certify to OCS standards, we work with producers to ensure a final product contains the accurate amount of a given organically grown material.

The Goal of the Organic Content Standard (OCS) is to ensure trust in organic content claims.

The OCS accomplishes this goal by verifying the presence and amount of Organic Material in a final product. It provides a strong chain of custody system from the source of the organic raw material to the final product through certification.

OCS 100 logo is used for only for product that contains 95% or more organic material.

#### Brands

B&C B&C DNM B&C PARADISE  
Babybugz



#### Oeko – Tex 100 Standard

#### www.oeko-tex.com

Confidence in Textiles – that has been the motto of the independent testing for harmful substances according to OEKO-TEX® Standard 100 for textile products of all types which pose no risk whatsoever to health since 1992. With regard to the global structure and high division of labour in textile production the OEKO-TEX® criteria catalogue for the first time provides manufacturers in the textile and clothing industry with a uniform benchmark on a scientific basis for the evaluation of potentially harmful substances in textiles.

The OEKO-TEX® label indicates the additional benefits of tested safety for skin-friendly clothing and other textiles to interested end users. The test label therefore provides an important decision-making tool for purchasing textiles.

#### Brands

Anvil	Front Row	Mumbles
B&C	Fruit of the Loom	Portwest
B&C Denim	Gamegear	Premier
B&C Paradise	Gildan	Russell
Babybugz	Grizzly	SF
Brook Taverner	Henbury	Snickers
Comfort Colours	Jerzees Schoolgear	Splashmacs
Craft	Kooga	Tombo
Dennys	Kustom Kit	Tombo Startline
Finden & Hales	Larkwood	Towel City
Formula Racing	Madeira	



#### www.wrapcompliance.org

Worldwide Responsible Accredited Production (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.

#### Brands

Anvil	Gamegear	Premier
AWDis	Gildan	Russell
Bargear	Grizzly	SF
Bella+Canvas	Henbury	Splashmacs
Comfort Colours	Jerzees Schoolgear	Stormtech
Finden & Hales	Kustom Kit	Tombo
Formula Racing	Larkwood	Tombo Startline
Front Row	Mumbles	Towel City
Fruit of the Loom	Portwest	



#### www.sedexglobal.com

Sedex, the Supplier Ethical Data Exchange, is a not for profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains.

### Brands

Anvil	Grizzly	Result Urban
Alexandra	Henbury	Result Winter
Bargear	Kustom Kit	SF
Callaway	Larkwood	Spiro
Comfort Colours	Mumbles	Splashmacs
Dickies	Ogio	Tombo
Finden & Hales	Result	Tombo Startline
Formula Racing	Result Core	Towel City
Front Row	Result Headwear	
Gamegear	Result Safe-Guard	
Gildan	Result Work-Guard	



### www.fairwear.org

Fair Wear Foundation is an independent, non-profit organisation that works with companies and factories to improve labour conditions for garment workers. FWF's 90 member companies represent over 120 brands, and are based in seven European countries; member products are sold in over 20,000 retail outlets in more than 80 countries around the world. FWF is active in 15 production countries in Asia, Europe and Africa.

### Brands

B&C	B&C DNM	B&C Paradise
Brook Taverner		



### REACH

### www.hse.gov.uk/reach/

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.

### Aims

REACH has several aims:

- To provide a high level of protection of human health and the environment from the use of chemicals.
- To make the people who place chemicals on the market (manufacturers and importers responsible for understanding and managing the risks associated with their use.)
- To allow the free movement of substances on the EU market.
- To enhance innovation in and the competitiveness of the EU chemicals industry.

- To promote the use of alternative methods for the assessment of the hazardous properties of substances e.g. quantitative structure-activity relationships (QSAR) and read across.

### Brands

Asquith & Fox	Gamegear	Result Safe-Guard
AWDis Academy	Grizzly	Result Urban
AWDis Just Cool	Ki-Mood	Result Winter
AWDis Just Hoods	Kooga	Result Work-Guard
AWDis Just Sub	Kustom Kit	RTXtra
AWDis So Denim	Madeira	RTX Enhanced Visibility
Bagbase	Nimbus	RTY High Visibility
Bargear	Portwest	RTY Workwear
Beechfield	Premier	Spiro
Build Your Brand	Quadra	TriDri®
Craghoppers	Result	Westford Mill
Dickies	Result Core	
Formula Racing	Result Headwear	



### The Business Social Compliance Initiative (BSCI)

### www.bsci-intl.org

A non-profit organisation dedicated to the improvement of working conditions in the supply chain, with factories audited against the BSCI base code. Mantis World works with factories that are BSCI compliant or equivalent as an acceptable level of compliance.

### Brands

Babybugz	Henbury	SF
Bargear	Ki-Mood	Splashmacs
Finden & Hales	Kooga	Stormtech
Formula Racing	Kustom Kit	Tombo
Front Row	Larkwood	Tombo Startline
Gamegear	Mumbles	Towel City
Grizzly	Premier	



# OUR BRANDS



## PERFORMANCE · PASSION · INTEGRITY · DIVERSITY

These are the core values found in sport. Sport is the soul of the adidas group. We measure ourselves by these values, and we measure our business partners in the same way.

Consistent with these values, we expect our partners – contractors, subcontractors, suppliers, and others – to conduct themselves with the utmost fairness, honesty and responsibility in all aspects of their business.

We use the adidas group 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

The adidas group 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. The adidas group expects 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 Nations' 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 us 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.



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The logo for Alexandra, featuring the word 'Alexandra' in a stylized, cursive blue font.

### ABOUT US

MWUK Ltd is a division of The Men's Wearhouse Inc, a Fortune 100 Best Company to work for and leading retailer in the USA and Canadian marketplace.

MWUK Ltd is the UK's leading corporate and workwear supplier, consisting of:

- Alexandra
- Boyd Cooper
- Dimensions
- Yaffy

The MWUK Ltd clothes over 4 million people every year, despatching over 19 million garments throughout the UK, Europe and across the world.

You may wonder how we manage to keep track of the individual requirements of each and every wearer - it's all in the detail!

Whether you require an off-the-shelf product, a bespoke design service or a total service solution for thousands of personnel, we offer the most comprehensive service package in the industry, fully tailored to meet the individual requirements of each client company.

Whether for practical, professional garments for almost any aspect of the commercial world, or specialist product for the emergency services and healthcare sectors, dedicated account teams manage every stage of the process; from design, through procurement, manufacture, delivery and stock control.

The secret of our success?

There is no standard package. The detail lies in adding value to your organisation and your specific needs.

### CSR POLICY STATEMENT

MWUK Ltd is a multi-site distributor and contractor whose principal activity is the supply of corporate wear and workwear products to the retail, financial, emergency services, healthcare, manufacturing, travel and public sectors. The main products supplied are clothing, footwear, PPE and associated accessories.

The Board of Directors recognise that the health, safety and welfare of employees, visitors, contractors, external stakeholders and the wider community, who may be affected by its operations is of primary importance in the successful conduct of its business. It also recognises its obligations to care for the environment through the prevention of pollution, and the implementation and monitoring of good environmental practices. The company strives to maintain best practice seeking continuous improvement and innovation through the implementation through our accreditation of BS EN ISO 14001 Environmental Management System alongside our current certification to BS EN ISO 9001. This policy is signed by the Executive Chairman to demonstrate the Board's commitment to it. This policy has been adopted by the Board of Directors for all sites and a copy is posted at each location.

### General Policy:

MWUK Ltd will, so far as is reasonably practicable, provide;

- Adequate resources to ensure the proper provision for the implementation of the HS&E management systems and compliance with current legislation and adopted guidance.
- Plant, work equipment and systems, which are safe, and without risks to health.
- Arrangements for the safe use, handling, storage and transport of articles and substances for use at work and minimise the environmental impact of such processes.
- Each employee with such information, instruction, training and supervision as is necessary to protect their own health and safety and that of others that may be



affected by their acts or omissions.

- A working environment that is safe and without risks to health, with adequate means of access and egress, and adequate welfare arrangements.
- Arrangements for effective employee consultation regarding health, safety and environmental matters.
- Monitoring procedures to maintain agreed standards and ensure that steps are taken to reduce the likelihood of days lost from work related injury and ill health.
- Adequate and competent Health, Safety and Environmental personnel to assist in applying the provisions of health, safety and environmental law.
- Information, advice, facilities and products to promote the economic minimisation of energy use, waste produced, and fuel usage.

It is the responsibility of the Executive Chairman to ensure the policy is implemented across the organisation and already provided for.

### **Health & Safety**

MWUK Ltd is committed to high standards of health and safety for all employees, recognising our duty and the benefits of providing safe working conditions. MWUK Ltd policy is displayed throughout the workplace and is available on the company's internal networking system. Whilst the Executive Chairman is the Board Director responsible for the health and safety performance of the company, the systems in place ensure that responsibility exists throughout all of the business.

In particular, forklift and commercial driver training form an important part of MWUK Ltd workplace safety policy, which impacts on reduced insurance costs, enhanced pedestrian and site safety and improved working environment. Daily inspections complement periodic training to keep vehicle and driver awareness at peak performance.

### **Environment**

We seek to minimise the environmental impact of our activities through the prevention of pollution, reducing waste, and implementing a good environmental management system, which are, where applicable, externally audited. We are committed to conducting our activities and operations in line with current legislation and best environmental practice seeking continual improvement and innovation across all sites and activities.

For further information see Environmental Policy.

### **Transport**

MWUK Ltd accepts that motor vehicles are responsible for significant emissions to the atmosphere and by reducing distances travelled, we can benefit the environment and the health of our staff and the general public. Our policy is to improve the environmental impact of our fleet by operating with a cap to the CO2 emissions for vehicles on our fleet list.

### **Suppliers**

We regard suppliers as our partners and work with them

to achieve our aspirations in the delivery of products and services. MWUK Ltd is committed to working with suppliers to understand where products are sourced and ensure that the principles of environmental sustainability are upheld. MWUK Ltd works to ensure that the welfare of workers and labour conditions within our supply chain meet or exceed recognised standards.

### **Business Principle and Code of Ethics**

We are committed to ensuring that our business is conducted, in all respects, according to the highest ethical and professional standards, in accordance with the principles of the Bribery Act 2010, and the Equality Act 2010, taking into account legalisation and customs in the countries and regions in which we operate.

### **Customers**

We recognise that our business and livelihood depends upon our customers. Every employee is responsible for ensuring that customer contact is professional and appropriate. We aim to continuously improve the level of service and quality of product.

### **Employees**

MWUK Ltd policy is to provide equal opportunities to all existing employees and anyone seeking to join. MWUK Ltd recognises that its reputation is dependent on the quality, effectiveness and skill base of its employees and is committed to the fair and equitable treatment of all its employees and specifically to prohibit discrimination on the grounds of gender, (including gender reassignment), sex, marital or civil partnership status, having or not having dependants, pregnancy/maternity, religion or belief, race (including colour, nationality, ethnic or national origins), disability, sexual orientation, age, work role/type (including part time workers, fixed term contracts and those in Trade Unions).

MWUK Ltd has a commitment to ensure that all employees and management are properly inducted into the business and given the necessary training to fulfil their roles and to develop their full abilities. MWUK Ltd recognises the importance of good communications with employees and acknowledges that there should be clear channels of communication and opportunities for consultation and dialogue on issues which affect both business performance and employee's work lives. This is achieved through a variety of media including the company's notice boards, newsletters, meetings and employee forums.

The HR team have responsibility for human resource issues within MWUK Ltd under the direction of the Executive Chairman who is responsible for human resource issues at Board level.

### **Community & Donations**

MWUK Ltd endeavours to contribute to the communities in which it operates. This is mainly achieved through charitable donations and other initiatives that help the community.

It is MWUK Ltd policy not to make political donations.

### **EQUAL OPPORTUNITIES AND DIVERSITY POLICY**

Our equal opportunities and diversity policy is designed to ensure that, as a minimum, our organisation embraces the principles of the Equality Act 2010.

We also extend the scope of the equal opportunities policy to cover groups and categories that enjoy different levels of statutory protection from discrimination. We wish to apply our policy more generally to our business, for example, to extend equality of opportunity to customers or users/beneficiaries of our services where these same basic principles apply. The aim of this policy is to communicate the commitment of the Executive Chairman, Board of Directors and senior management team to the promotion of equality of opportunity and diversity in MWUK Ltd. It is our policy to provide employment equality to all.

We are opposed to all forms of unlawful and unfair discrimination or victimisation. All job applicants, employees and others who work for us will be treated fairly and will not be discriminated against on any of the above grounds. Decisions about recruitment and selection, promotion, training or any other benefit will be made objectively and without unlawful discrimination. We recognise that the provision of equal opportunities and the encouragement of diversity in the workplace is not only good management practice; it also makes sound business sense.

Our equal opportunities and diversity policy will help all those who work for us to develop their full potential and the talents and resources of the workforce will be utilised fully to maximise the efficiency of the organisation.

Our Equal Opportunities and Diversity policy applies to all those who work for the organisation and the following groups or categories:

- Job applicants and potential applicants
- Contract and Agency workers
- Trainees and students on work experience or placements
- Volunteer workers
- Former employees

#### **We are committed to:**

- Promoting equality of opportunity for all persons
- Promoting a good and harmonious working environment in which all persons are treated with respect
- Preventing occurrences of unlawful direct discrimination, indirect discrimination, harassment and victimisation
- Fulfilling all our legal obligations under the equality legislation and associated codes of practice
- Complying with our own equal opportunities and diversity policy and associated policies
- Taking lawful affirmative or positive action, where appropriate, regarding all breaches of equal opportunities and diversity policy as misconduct which could lead to disciplinary proceedings

Employees who believe that they have suffered any form of discrimination, harassment or victimisation are entitled to raise the matter through the Company's Grievance Procedure (this also incorporates our Harassment procedure). All complaints of discrimination will be dealt

with seriously, promptly and confidentially.

## **ETHICAL SOURCING & MANUFACTURE**

We are committed to provide 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, MWUK Ltd are also aware of the potential social impact that offshore supply can have. For this reason, we have issued a statement regarding humane manufacturing conditions in overseas countries.

As a member of the Ethical Trading Initiative, MWUK Ltd aspires to support our supplier's efforts to embrace and implement the 9 Point Base Code below to create a fair and safe working environment for all employees. We are constantly striving to improve working conditions and human rights in an environmentally friendly work place.

#### **9 Point Base Code:**

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed

MWUK Ltd take all reasonable and practical steps, including factory visits by the company's staff, representatives or agents, to ensure 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.

MWUK Ltd use external audits conducted by a recognised international audit company to benchmark our suppliers across all areas of Health and Safety, Workers Welfare, and Environmental impact. Our audit scope reviews that the factories are operating within country laws and working towards full implementation of the Ethical Trading Initiative Base Code. MWUK Ltd in conjunction with our partner factories are continuously reviewing our working practices to improve the welfare of our employees and suppliers and minimise our environmental impact.

If despite these precautions, unacceptable practices are brought to the company's notice, we will take immediate action to investigate and achieve remedies.

MWUK Ltd reserve the right to cancel orders placed and review its relationships if a manufacturer, supplier or their agent is found not to be operating within local and country laws or violating the 9 Point Base Code. Every effort will be made by the MWUK Ltd compliance team to work with and support the factory in dealing with issues in order to maintain working practices in line with our expectations.

## **ENVIRONMENTAL POLICY**

MWUK Ltd is committed to produce quality corporate and workwear related products whilst ensuring the highest level of customer service.

The company recognises that our day-to-day operations impact on the environment in a number of ways. MWUK Ltd is therefore focussed on minimising the potential harmful effects of such action, wherever and whenever practical, by implementing a robust environmental framework.

MWUK Ltd is committed to achieving environmental best practice throughout our business by:

- Ensuring our activities are safe for our employees, sub-contractors, customers and others who come into contact with our work
- Complying with legal and other requirements
- Monitoring internal operations including energy and transport to ensure best use of natural resources and minimising environmental impact
- Minimising the waste produced in all parts of our business
- Ensuring associates and sub-contractors understand and are accountable to these policy goals through communication and training
- Prevention of pollution through external re-use and recycling by transferring materials offsite for re-use and recycling
- Achieving continual improvement through the development of our environmental performance, evaluation procedures and associated indicators, objectives and targets

All staff receive the necessary instruction and training to enable them to understand our Environmental Policy management system in order to contribute effectively to its operation.

This policy is available to the public on request.

## **HEALTH & SAFETY POLICY**

The board believes that a safe working environment and the avoidance of accidents will contribute to both the well being of our staff, and also have beneficial impact on business performance.

Our statement of general policy is:

- To provide adequate control of the health and safety risks arising from our work activities.
- To provide and maintain safe plant equipment.
- To provide information, instruction and supervision for employees.
- To ensure all employees are competent to do their tasks, given adequate training, and provided with personal protective equipment where appropriate.
- To prevent accidents and cases of work related ill health.
- To maintain safe and healthy working conditions, and to provide adequate financial and physical resources to ensure this.
- To provide adequate welfare facilities for all our staff.
- To review and revise this policy as necessary at regular intervals.

- To commit to continuous improvement in Health and Safety performance.

## **Responsibilities**

- The board of directors are responsible for ensuring that this policy is maintained and that the company's operations are executed in such a way as to ensure the Health, Safety and Welfare of all employees and other persons who may be affected by our operations.
- Overall and final responsibility for Health and Safety is that of the Executive Chairman.
- Day-to-day responsibility for ensuring this policy is put into practice and delegated to the relevant line manager or director.
- All employees have to:
  - Co-operate with supervisors and their manager on
  - Health and Safety matters.
  - Use any safety equipment provided to them for their Health and Safety.
  - Not interfere with anything provided to safeguard their Health and Safety.
  - Take reasonable care of their own Health and Safety.
  - Report all Health and Safety concerns to an appropriate person.

## **Health and Safety risks arising from our work activities**

- Risk assessments will be undertaken by qualified risk assessors and the appropriate manager.
- The findings of the risk assessments will be reported to the line managers and staff.
- Action required to remove / control risks will be improved by the department manager and the Safety Officer.
- The department manager will be responsible for making sure the action required is implemented.
- The department manager and the Safety Officer will check that the implemented actions have removed / reduced the risks.
- Assessments will be reviewed every 12 months or when the work activity changes, whichever is soonest.

## **Information, instruction and supervision**

- The Health and Safety law poster is displayed on the main notice board at all locations.
- Health and Safety advice is available from your line manager, or the Human Resource department.
- Supervision of young workers / trainees will be arranged, undertaken and monitored by the department manager and the Human Resource department.
- The department manager is responsible for ensuring that, where appropriate, our employees working at locations under the control of other employers are given relevant Health and Safety information.

## **Competency for tasks and training**

- Induction training will be provided for all employees by

the Human Resource department, line management or other appointed person.

- Job specific training will be provided, or arranged by the department manager or the Human Resource department.
- Specific jobs requiring special training are maintenance staff, fork lift truck drivers and users of any equipment with any moving parts.
- Training records are kept by the Human Resource department.
- Training will be identified, arranged and monitored by the department manager.

#### **Accidents, first aid and work-related ill health**

- The first aid boxes are maintained by the first aiders at each premises.
- The appointed person(s) and first aider(s) are detailed on the notice boards.
- All accident and cases of work-related ill health are to be recorded in the accident book. The book is kept either with the first aid box, the location manager, or by the Human Resource department.
- The Human Resource manager is responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority.

#### **Monitoring**

- To check our working conditions and ensure our safe working practices are being followed, we carry out active monitoring and periodic reviews.
- The line manager is responsible for investigating accidents.
- Accidents involving serious injury will also be investigated by the Human Resource Manager.
- The line manager and the Human Resource department are responsible for investigating work related causes of sickness absence.
- The department manager is responsible for acting on investigation findings to prevent a recurrence.

#### **Emergency procedures – fire and evacuation**

- Risk assessments will be undertaken by qualified risk assessors and the appropriate manager.
- Escape routes are checked and kept clear by line managers every day.
- Fire extinguishers are checked and maintained by external contractors every 12 months.
- Alarms are tested by appointed staff weekly and by external contractors every 6 months.
- Emergency evacuation will be tested every 6 months.

#### **Quality Policy**

It is the policy of MWUK Ltd to provide products and services that fully and consistently meet the agreed requirements for our customers and ensure that products are manufactured to defined standards of content and fitness for purpose. To demonstrate this, MWUK Ltd operates and has certification to Quality Management

System EN ISO 9001:2008.

We source our garments and products from a variety of suppliers around the world. In order to uphold our rigorous quality standards wherever the items are manufactured, all our contracted manufacturers and suppliers are subject to continual assessment to ensure that our standards are maintained. They are required to adhere to our quality control / auditing procedures, which requires a combination of quality auditing at the manufacturing locations as well as ongoing acceptable quality level (AQL) reports plus inspections once items are delivered to our distribution units. MWUK Ltd supply chain network includes many suppliers who have EN ISO 9001:2000 or EN ISO 9001:2008 and we require periodic re-confirmation of their quality management procedures as part of our ongoing supplier review process.

#### **Our procedures include:**

- Each product is sampled, fully graded where applicable and formally approved, with sealed samples maintained as a benchmark for production and finished goods.
- Certificates of conformity are required for the supply of materials.
- Fabric shade standards established with the fabric supplier, MWUK Ltd, the fabric team, and the contractor.
- Contracted manufacturers are visited by MWUK Ltd staff prior and during production.
- On-line inspection of part-finished items, combined with full quality inspection prior to being dispatched to MWUK Ltd.
- Random statistical audit of finished items when they are received at our distribution unit.
- Sub-standard work, noted during production or audit, is rejected and the contractor fully briefed on the corrective action needed for future supply.

It is the responsibility of every employee to ensure his or her own conduct conforms to the expected standards and reflects the company quality policy.

The performance of the system is monitored through scheduled audits, reviews of Key Performance Indicators and an annual board review; these reviews are used to drive a culture of continuous improvement.

#### **MWUK Ltd are members of:**

- ETI (Ethical Trading Initiative) [www.ethicaltrade.org](http://www.ethicaltrade.org)
- Sedex - Membership Number - S325092369777
- SATRA
- UL-STR (partner testing house)

[www.dimensions.co.uk](http://www.dimensions.co.uk)

[www.alexandra.co.uk](http://www.alexandra.co.uk)

[www.yaffy.co.uk](http://www.yaffy.co.uk)



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## American Apparel®

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### SOCIAL COMPLIANCE POLICY

American Apparel 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 LABOUR

American Apparel employees must be the minimum legal working age.

### NO DISCRIMINATION

American Apparel seeks to hire, retain, promote, and otherwise treat all applicants and employees without regard to race, colour, religion, age, sex, gender or gender identity, sexual preference, marital status, national origin, ancestry, citizenship, veteran status, physical or mental disability, medical condition, pregnancy, or any other characteristic protected by applicable law.

### WAGES

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

All employees are offered the opportunity to receive benefits.

### WORKING HOURS

Employee hours are set in accordance to state, local, and/or federal law.

Overtime will be paid in accordance to state, local, and/or federal laws.

Employees are entitled to at least one day off from work per week.

### HARASSMENT AND ABUSE

American Apparel does not tolerate harassment of employees by another employee, supervisor, or any vendor or customer. Harassment of third parties by American Apparel employees is also prohibited. Any form of harassment on the basis of race, religion, colour, national origin, ancestry, legally protected medical condition, marital status, sex (including pregnancy, childbirth, or related medical conditions), gender identity, age, veteran status, sexual orientation, or any other basis protected by federal or state, or local law is a violation of this policy.

### 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, 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.

### MODIFICATION OF POLICY

Our Social Compliance Policy may be amended from time to time at our sole discretion and without notice. This policy is subject to and is not intended to replace or supplement our Employee Handbook, Human-Resources and/or company policies and procedures.



With more than 42,000 employees worldwide, we understand the direct link between operating responsibly and our financial success and future growth. Our Genuine Gildan program, with its four key pillars, is designed to create value for our various stakeholders.

We believe that our Genuine Gildan program is a key foundation for the sustainable growth of our Company and we are well-poised to address the social and environmental challenges we face.

### GENUINE GILDAN

#### Environment

Our commitment to pursue continuous improvement and reduction of our environmental footprint is driven by our long-term vision, our investments and our understanding of the full life cycle of our operations and products.

- Recycled or repurposed 91% of total waste in 2014
- Powered 53% of our total energy needs by renewable resources in 2014
- Reduced our greenhouse gas emissions intensity by 45% from 2010 – 2014

#### Community

At Gildan, we take pride in being an active member in communities where we operate by acting responsibly and creating sustainable economic impacts.

- Donated U.S. \$3.5 million in 2015 to community projects in Honduras
- Invested over U.S. \$1.9 million into the Central American Polytechnic Institute (IPC) in Honduras which has graduated over 6,500 students

#### People

While our capital investments are a key part of our success, our over 42,000 employees remain Gildan's most important resource. We are proud to create stimulating and rewarding work environments for employees who share in the Company's success.

- 337 internal and external social audits performed at

owned facilities and third-party contractors in 2015

- Our fully-equipped medical clinics received more than 142,700 free medical care visits from employees this year

Provided nearly 1,000,000 man-hours of training in 2015.

## Product

Across our family of brands, Gildan has built a reputation for delivering high quality, great value products. Our Global Quality System (GQS), in combination with stringent environmental management systems, assures our customers that the products we deliver are safe and manufactured to the highest standards.

- Our Gildan® and Anvil® branded apparel is Oeko-Tex Standard 100 certified
- Gildan's products predominantly feature U.S. Cotton, sustainably grown and ethically harvested

## Code of Conduct

Our Code of Conduct guides our activities at each of our global operational locations. Gildan's Code of Conduct unmistakably asserts our position on a wide range of labour practices that include: child labor, forced labour, compensation, hours of work/overtime, health and safety as well as many other best practices that Gildan's management feels are integral to both our organization and our employees. Every employee and management team member is required to comply with Gildan's Code of Conduct.

Gildan's Code of Conduct also encompasses principles set forth by the Fair Labor Association (FLA) and the Worldwide Responsible Accredited Production (WRAP). The FLA's stated purpose is to protect workers' rights and improve working conditions worldwide, while WRAP's set of principles establishes best practices commonly agreed upon in the area of social responsibility.



## ASQUITH & FOX

### REACH

We can confirm that the products supplied to you under the Asquith & Fox brand name conform to current REACH Regulations and do not contain any of the harmful substances controlled under its restricted substances list.

**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 (SVHCs) and are listed on the European Chemicals Agency (ECHA) website.

[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)

Asquith & Fox products comply with the EU general Product safety Directive 2001/95 EC, Also comply with the requirements of the Azo dye directive and Nickel directives meaning that no Dangerous substances and Preparations are used during the make up of any of its garments.

### The Azo Dye Directive EU Directive 2002-61-EC, and subsequent amendments

This directive covers those Azo dyes, which are degradable to carcinogenic aryl amines, and is applicable to Textiles and Leather used in finished articles or their dyed parts, which may come into direct and prolonged contact with the human skin or oral cavity. National Laws implementing the new directive restrict azo-colourants (dyes) in textiles and leather, replacing current restriction in Germany, Austria and the Netherlands. (The German and Austrian requirements for Azo-pigments will be retained, as they are not covered under this directive.)

### Garment production

When engaging in business Asquith & Fox always conduct a full factory audit and anyone working with them must adhere to a detailed code of conduct, which is integral to the business and that all suppliers and their sources must adhere to. The Asquith & Fox code of conduct is based on current best practices with regard to employment ethics, health and safety practices and environmental practices which include conforming to the Azo Dye Directive EU Directive 2002-61-EC; 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
- All dyes comply to EU regulations with regard to harmful dyes

### Labeling Summary

In order to ensure that all products within the European Union comply with the legislation, products are manufactured and labeled according to the following regulations:

**EU Textile Labeling Regulation** - The European Parliament and the Council of the European Union enacted the Textile Labelling Regulation on 27 September 2011, which became effective on 8 May 2012.

In accordance with all laws and ordinances, all Asquith & Fox garments are labelled and contain the following information:

- Model or item number of the product for unique



identification

- Name and VAT number for identification of the manufacturer or importer
- Fibre composition of textile products according to Annex I of the Textile Labelling Regulation (other materials must not be named) in all the languages of the countries of the European Union, in which the textiles are to be sold (23 official languages, to make very sure)
- The weight proportions of all individual fibres must be shown as a percentage in descending order
- 10 EU countries also require Country of Origin in their prospective language

### Regarding fitting of labels, the following is observed:

Labelling and names of textile products must be durable, visible, easily readable and accessible; the label must be firmly attached.

### Testing

On Asquith & Fox garments the following performance testing could include any of the following standards:

Colour Fastness to Washing: BS EN ISO 105 C08: 2010

Colour Fastness to Water: BS EN ISO 105 E01: 2013

Colour Fastness to Rub: BS EN ISO 105 X12: 2002

Colour Fastness to Light: BS EN ISO 105 B02: 2013

Stability to Washing: BS EN ISO 6330: 2012

Formaldehyde (Free and Released) BS EN 14184 parts 1 and 2 2011 (not detectable for infant garments, 75ppm free, 300ppm released for others)



AWDis (Just Hoods by AWDIs, Just Cool by AWDIs, Just Sub by AWDIs, So Denim 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 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. AWDIs will not do business with any vendors or suppliers who violate the legal and ethical rights of employees in any way.



B&C has signed up to the FWF's Code of Labour Practices, and thereby has committed to adhere to the labour standards in their own business operations.

The Fair Wear Foundation (FWF) exists to promote fair labour conditions in the garment industry worldwide and to supervise audits internationally.

The Fairwear Foundation verifies that the Code of Labour Practices is implemented and respected at the factories.

By becoming member of FWF, we committed ourselves to implementing and maintaining a Code of Conduct designed specifically for the garment industry. This Code of Conduct is based on the Conventions of the International Labour Organisation and the Universal Declaration of Human Rights. This incorporates the following standards: No use of child labour, No use of forced labour, safe and healthy working conditions, legal labour contract, payment of a living wage, freedom of association and the right to collective bargaining, no discrimination against employees, no excessive hours of work.



## BABYBUGZ

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. Our factories 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



Beechfield is committed to upholding the highest ethical and environmental standards throughout our entire supply chain.

We operate according to an ethical policy that protects and rewards every individual involved in the manufacture and supply of our products. The ethical policy references and respects local laws, with regard to wages, health and safety, workers' welfare and human rights. It expressly forbids the use of coerced/forced labour, including child workers.

Our field based staff carry out full audits on all of our manufacturing partners to ensure that our ethical standards are constantly maintained.

We endeavour to protect the quality of the environment through sound environmental practice. We ensure that our manufacturing partners meet or exceed all local environmental laws and regulations, and we promote energy efficiency and the reduction of waste at every stage of production.

And we stay continually updated on REACH legislation, commissioning regular fabric and component testing to ensure compliance with this strict European product safety and environmental protection standard.

We know the value of your image and good reputation. You can rest assured that choosing Beechfield will only ever enhance your own ethical and environmental credentials.



## 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 compliances**

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.

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

As a further safeguard our garment manufacturers must agree to permit regular unannounced visits from our senior management team.

### **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 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.

**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.

## 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.



**BELLA+CANVAS**  
LOS ANGELES

## SOCIAL RESPONSIBILITY

### Eco-Friendly Fashion

We strive to use sustainable fabrics like 100% organic cotton whenever possible.

### Promoting a Healthy Lifestyle

We provide natural, organic food and drink to employees and have a company gym for use anytime.

## Solar Power Headquarters

We have reduced our energy usage by 5,000 kilowatts per month.

## Green Office Supplies

We reduce, reuse, and recycle.

## Natural Cleaning Products

We use bio degradable, non-toxic, and hypoallergenic cleaners.

## Hybrid Company Car

We advocate for fuel efficiency and carpool.



We at Bella believe in living a healthy, balanced lifestyle while minimising our impact on the environment.



## LABOUR STANDARDS

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.
- 3.2 Children and young persons under 18 shall not be

employed at night or in hazardous conditions.

#### **4. Freedom of association and the right to collective bargaining**

- 4.1 Worker's 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 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, 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 re 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.



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.

Contact persons in general:

Address: TB International GmbH Management – personal, confidential Dr.-Robert-Murjahn-Str. 7

64372 Ober-Ramstadt

Deutschland

E-Mail: hb@tbint.de

Contact persons in case of bribery and corruption: Address: TB International GmbH

Management –personal, confidential Dr.-Robert-Murjahn-Str. 7

64372 Ober-Ramstadt Deutschland

E-Mail: hb@tbint.de



Perry Ellis International proudly maintains the highest standards of social accountability:

#### GLOBAL LABOR COMPLIANCE

We believe that every person has a right to decent, humane and safe working conditions. Prior to the placement of production, factories are evaluated against our Vendor Code of Conduct and local labor laws, and thereafter are frequently monitored to ensure continued compliance.

The Vendor Code strictly prohibits child and forced labor, harassment, abuse and discrimination. Among other standards, we require that suppliers maintain a healthy and safe working environment, freedom of association, restriction on working hours and proper payment of wages.

Training is a key part of our program. Our internal audit team provides factories with guidance including mandatory annual educational seminars to provide updates on local labor laws and to review case studies and best practices as well as other related topics.

#### WORKPLACE DIVERSITY

Our commitment to diversity is based on respect for the individual, regardless of sex, race, ethnicity, country of origin, preferences or ideas. Offices located around the world are staffed by a family of culturally diverse associates and backed by suppliers from over 30 countries, generating an open and dynamic environment which positively impacts all areas of our business.

#### ENVIRONMENTAL SUSTAINABILITY

We strive to increase responsible stewardship on a

daily basis, from materials sourcing to fabrication and throughout the supply chain. Together with our retail partners, we have made substantial progress towards reducing the quantity of packaging materials and increasing the quality of component materials, in some instances removing poly bags on replenishment programs, increasing quantities-per-shipment, printing hangtags on partially-recycled papers, and producing clothing with organic materials or recycled polyester. Meanwhile, our warehouses re-use or recycle corrugated cardboard, having surpassed 60 tons per month of recycling in our Tampa facility.

Our associates have also joined the effort. An ongoing program called Eco-Start® not only educates associates but encourages new ideas. It has led to recycling programs in all offices, moderated thermostat settings, digital paystubs and an increased usage of digital forms, lighting occupancy sensors and the replacement of warehouse lighting with low-consuming halogen bulbs, closed-topped and washable beverage containers given to associates for use with filtered water fountains, and corporate printing that is forestry certified and uses at least 30% post-consumer waste material, among other initiatives.

## COMMUNITY INVESTMENT

Perry Ellis International and its associates are proud to contribute time and resources to the efforts of a number of international, national and local initiatives and charities which help strengthen our global communities. Through giving back to the people and institutions around us, we are able to transform our position as one of the country's top apparel producers into an agent of positive and responsible change.



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.



Comfy Co's goal is to create and encourage creation of model operations that provide good jobs at fair wages and also improve conditions in their communities. Comfy Co only do business with vendors and suppliers that share the company's high ethical, legal and moral standards.

All suppliers, vendors and other business partners are expected to comply with Comfy Co's Operating Principles and to assure compliance in all contracting, subcontracting or other relationships. Comfy Co believes it is effectively exercising its economic leverage with business partners by establishing these guidelines to encourage their full compliance with laws that are designed to protect employees and support business conduct.

The guidelines have been developed to ensure consistent compliance by suppliers and vendors alike. Comfy Co recognise that the guidelines also assist management in selecting business partners and follow work place standards and practices that comply with Comfy Co's Operating Principles.



## Our approach to sustainability

The world is faced with several challenges in the dimensions of sustainable development – economic, social and environmental. We believe it is increasingly important that we all take responsibility for our global impacts.

New Wave Group is working with social and environmental sustainability under the term CSR (Corporate Social Responsibility). This means we strive for business solutions that are financially beneficial, but also sustainable from a social and environmental perspective.

This folder provides customers, investors and other important stakeholders with more information on our work and ambitions for CSR. As a listed company, it is fundamental to communicate how we achieve sustainable growth. It gives us the opportunity to highlight what New Wave Group has accomplished – but also how we could improve.

We have identified three focus points which we believe are the most relevant for social and environmental responsibility within our business. The focus points are chosen to achieve synergies for all New Wave Group-

companies.

"The company engine runs on growth – but with sustainability as navigator." Torsten Jansson, CEO.

### Our focus points are:

- Design and Product Development
- Purchases and Production
- Logistics and Transportation

These focus points represent a significant part of our every-day business operation. In this way, we aim to successfully implement social and environmental strategies in the core of our company.

### CEO STATEMENT

A successful business in the long-term will depend on sustainable business solutions. To integrate our financial responsibility with social and environmental perspectives is hence a natural part of our long-term thinking.

New Wave Group has the possibility to contribute and make a difference through our global operations. I'm proud of that. We always strive to find better and smarter solutions to the challenges we face. However, working for sustainability is an endless quest – the journey of New Wave Group has just begun.



### CRAGHOPPERS

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#### Our way

We work with our factories all over the world, but before doing so we ensure that they share our passion for the outdoors and that they follow the same working ethics as we do. Before we consider working with a supplier, we check that they are as passionate about what they do, as we are. Following an initial introductory letter which clearly shows our commitment to Ethical Trading (including a Child Labour Zero Tolerance Letter and a AZO dye Letter and PFOS fabric protector letter) a visual factory evaluation will be carried out. The workers and managers of the factory are then questioned further. It is our responsibility to ensure all suppliers understand the code and the importance of it.

In addition to our own evaluations, we also use a recognised third party organisation,

Our 3rd party auditing house will initiate training to ensure each factory understands the audit requirements and can prepare the necessary documentation. The audit is scored on a points basis with 95% classed as outstanding and 60% and below as not recommended. Those suppliers with 70% and above will be passed. An action plan is sent out and we would work with the factory on all recommendations suggested to help them achieve the best level they can. Each month new targets are set to encourage our suppliers to continually improve

and they are monitored by regular visits from the UK and our office in the Far East.

#### Child labour - Zero Tolerance

- Child labour is not tolerated by Regatta
- No children younger than the minimum age established by law or under an age interfering with compulsory schooling shall be employed.
- Each worker is required to provide an ID card or proof of age documents before employment commences
- In the event that child labour is found, the supplier must immediately react with due consideration for the care of the children
- No new recruitment of children shall occur
- Further breaches will prevent Regatta from continuing to work with the factory
- Young persons under the age of 18 shall not be employed at night or in hazardous conditions

#### Employment and Discipline

- Regatta does not condone and will not be party to any form of forced or involuntary labour
- All employees must attend work voluntarily
- Any requests for employees to lodge "deposits" or identity papers are strictly forbidden
- Workers are free to leave their employers after reasonable amount of notice
- Any sort of disciplinary measures must be recorded
- Deduction of wages as a disciplinary measure is not permitted

#### Harassment, Abuse and Discrimination

- The work environment shall be free from abuse, harassment, intimidation or physical punishment of any sort
- Regatta and our third party organisation carry out interviews with workers in confidence to ensure there are no cases of bullying, abuse or discrimination based on nationality, race, religion, gender, age, personal characteristics or beliefs
- Employees are hired, paid and promoted based on their ability to do the job. If the employee cannot fulfil their duties adequately it will be at the discretion of the employer to terminate the contract

#### Health and Safety

- It is the responsibility of the employer to ensure the provision of a safe and hygienic working environment, including safe housing where appropriate
- Health and safety is a major part of Regatta's initial visual factory evaluation and only upon completion of all points and compliance, will Regatta start working with the factory
- Areas covered include: exits unblocked/unlocked, exits leading to place of safety, availability of fire extinguishers and other fire fighting equipment, sufficient aisle space which is free of obstruction and have clear markings, appropriate and adequate amount of first aid equipment provided

- It is also a condition that employees will be provided with safety equipment and sufficient safety training
- Unrestricted access to clean sanitary facilities and potable water shall be provided

### Working Hours and Remuneration

- Total working hours will not exceed the maximum legal limits
- All overtime shall be voluntary and workers will be paid overtime in accordance with national law
- Wages must be at least the minimum required by local law, including allowances and benefits
- All workers must receive a clear contract, a letter of employment or other verifiable statement, setting out the terms and conditions of employment, including working hours and rate of pay

### Housing and Accommodation

- Accommodation, if provided, should be clean, safe and in good repair
- There should be sufficient space, with no more than 10 persons per room, and suitable segregation by gender.
- There should be at least 2 fire escapes per floor with emergency exit routes clearly marked
- The accommodation must have suitable furniture and facilities

### Freedom of Association

- Suppliers will recognise the right of employees to join unions or representative committees and the right of worker's associations to collective bargaining

If there is any breach of this code which Regatta considers to be severe or persistent, or the supplier is unwilling or unable to make the necessary improvements within a reasonable time frame, Regatta may terminate its relationship with that supplier.



### ENVIRONMENTAL AND SOCIAL ISSUES

Denny's Uniforms are a prime manufacturer of catering clothing in the U.K. and abroad; we have long standing relationships with our factories and have adopted the following principles:

- That the majority of cloth used in our garments are produced, dyed, cut and sewn in the same area, which produces a uniform with minimal processing miles
- The closeness of each of our manufacturing processes

to each other ensures a minimum of packaging is used in transporting the materials. We believe our policy is the best environment and the quality of production

- Supplies that are manufactured abroad generally sent by sea freight rather than air freight
- When goods received at our Warehouse Distribution Centre, they arrive in packaging which is used to onward ship the goods to our customers. We do not waste resources re-boxing production. All obsolete packaging is sent for recycling
- Our overseas factories work to SA8000 social accountability principles which ensure that workers are treated according to basic Human Rights. This wide ranging standard covers all subjects to ensure fair working conditions

### Our Company Policy is enforced in the following areas:

- All paper used in catalogue production and marketing is made of 100% waste paper – this is certified to DIN ISO 14001
- We are proud that since June 2008 our fabric has achieved Oeko-Tex standard 100; this standard evaluates and screens for any harmful substances present within processed textiles
- Quality standards in our factories are approved to either BRC Global Standard for Consumer Products or SO 9001 or ISO 14001
- All office paper is recycled
- Light bulbs are all low energy
- Mailing catalogues are of a minimum size, which comply with standard letter postal size and weight thereby sending the maximum information for the minimum environmental impact
- Flexible working hours are supported to allow part-time working of parents with families

### EQUAL OPPORTUNITIES POLICY

#### STATEMENT OF POLICY

Denny's Uniforms Ltd is an equal opportunities employer. The aim of this policy is to ensure no job applicant or employee receives less favourable treatment on the grounds of disability, ethnic or national origin, gender or religion.

Breaches of this policy will lead to disciplinary proceedings and if necessary disciplinary action.

We will ensure that the policy is circulated to any agencies responsible for our recruitment and a copy of the policy will be made available for all employees and applicants for employment.

#### RECRUITMENT SELECTION AND PROMOTION

In order to attract applicants from a wider community, we may advertise vacancies in local and/or national press and local job centres. All applicants who apply for jobs with us will be treated fairly and will be considered solely on their ability to do the job.

All employees will be given equality of opportunity within the company's service and will be encouraged to progress within the organisation.

All staff involved in employment procedures will receive training in the application of this policy to ensure they are aware of its contents and provisions.

## MONITORING

To ensure direct or indirect discrimination is not occurring we will maintain and regularly review the employment records of all employees in order to monitor the progress of this policy.

Monitoring will involve:

- The collection and classification of information regarding the ethnic/national origin, gender and disability of all current employees
- The examination by ethnic/national origin, gender and disability of the distribution of employees and the success rate of applicants

The results will be reviewed and regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary to adjusting this policy to afford greater equality of opportunities to all applicants and staff. The company is committed to making this policy fully effective

## HEALTH AND SAFETY POLICY

Denny's Uniforms recognises and accepts its responsibilities as an employer for providing a safe and healthy work place and working environment for all of its employees and will take all steps within its power to meet this responsibility.

### Denny's Uniforms is fully committed to:-

- Giving a high degree of attention of Health and Safety matters in relation to both employees and other individuals including customers coming into contact with its business
- Ensuring that it complies with all relevant legislation and best practices
- Maintaining its sites in safe and hygienic condition

### The company will ensure that a local safety management system is implemented to:-

- Affect this policy through the systems and procedures outlined in the Company Health and Safety Manual
- Ensure that standards of safety are constantly reviewed and improved through identification of significant hazards, carrying out risk assessments and implementation of safe systems of work as necessary
- Periodically review the actions taken, performance against these commitments and the policy itself

All staff and visitors have a duty to take care of their own and others safety by complying with laid down company safety procedures.

## ENVIRONMENTAL POLICY

Denny's Uniforms Ltd, as part of its company commitments to the Business Community, recognises its obligations to comply with the law and carry out its business in an environmentally sound manner as possible. The company-wide policy is part of our commitment to minimising the impact of our operations on the environment to as low a level as is practically and

economically feasible.

### Our major direct environmental impacts are:

- Energy use
- Material and water use
- Transport emissions

### Our major indirect environment impacts are:

- The supply of uniforms to the Hospitality market

### The policy will be pursued through:

- **Material and water use:** Ensuring we make efficient use of resources, striving to reduce our use of materials including paper and stationery and minimising the use of water in our premises
- **Waste management and recycling:** Striving to apply the waste hierarchy (reduce, re-use, recycle) in all our activities; and
- **Supply Chain:** Considering the environmental performance of companies in our supply chain and where financially viable, giving preference to products and suppliers with least environmental impact

Denny's Uniforms will make this policy available to all staff through our Environmental Policy

This policy will be available to all interested parties.

Denny's Uniforms will review our progress and annually update our environmental policy and targets in accordance with best practice.



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## CORPORATE RESPONSIBILITY

### Code of Conduct

Integrity matters to Williamson-Dickie Manufacturing Company. For 90 years, we've worked to build equity in our good name and trademarks. Ultimately, we're responsible for the reputation and value of our company and its brands. We established this Code of Conduct to set expectations for our associates, brand representatives, licensees, distributors and manufacturers. By adhering to this code of conduct, we make a statement about how we're going to conduct business and how we expect those who do business with us to conduct themselves. We're committed to continuing our proud tradition of maintaining fair and ethical business practices.

- Our organization will not use contractors, subcontractors, manufacturers, raw material suppliers, full package suppliers, service providers or other



organizations (collectively “contractors”) that use child labor. Our organization will only use contractors that comply with applicable child labor laws

- Our organization will provide, and will strive to work only with contractors that provide, a safe and healthy workplace in compliance with local laws
- Our organization shall maintain clear aisles and exits designated for emergency evacuation, fire extinguishers mounted in prominent places, and medical supplies on site to handle minor medical problems
- Our organization will not knowingly conduct business with contractors that use forced labor or other compulsory labor in the manufacture and distribution of products. This includes labor required as a means of political coercion or as punishment for peacefully expressing political views
- Our organization will not knowingly use contractors that use corporal punishment or other forms of mental or physical coercion in the manufacture and distribution of products
- Our organization will respect cultural differences and will strive to work with contractors that employ associates based on their ability to carry out the duties of a particular job, and not on the basis of personal characteristics or beliefs
- Our organization will not knowingly use contractors that require more than sixty- (60) hour workweeks on a regularly scheduled basis in the manufacture and distribution of products, except for appropriately compensated overtime in compliance with local laws
- Our organization will seek to use only contractors that believe in the betterment of wages and benefit levels that address the basic needs of associates
- Our organization will not knowingly conduct business with contractors that violate environmental laws or regulations in the manufacture and distribution of products
- Our organization will not knowingly conduct business with contractors that violate international trade laws, or subscribe to or participate in boycott policies or activities not sanctioned by the United States

## Environment

Williamson-Dickie Manufacturing Company requires all our suppliers to ensure their manufacturing facilities comply with national and local environmental laws, including all laws related to waste and wastewater disposal, air emissions, discharges, toxic substances and hazardous waste disposal.

We also expect our suppliers to implement measures for reducing air and water pollutants, and have conservation and recycling programs including energy, water and raw material usage.

## Sustainability

Williamson-Dickie upholds the highest standards for customer satisfaction, business ethics, and responsible corporate practices. We are committed to supporting the communities in which our associates and customers live and work, as well as the international communities in

which we produce and sell our products.

We maintain a Code of Conduct and Corporate Environmental Guidelines. These guidelines provide direction and accountability for optimizing environmental compliance, employment practices and product safety.

Our ongoing sustainability efforts include:

- Strategic initiative and Sustainability Committee support
- Innovative product and packaging design emphasis
- Engineering staff in our factories and distribution centers, dedicated to continuous improvement projects eliminating and reducing process steps, process inputs or consumption as possible
- Measuring greenhouse gas emissions including energy, solid waste, and water usage
- Recycling programs for paper, plastic, cardboard, pallets, brass, and cloth
- Established supplier guidelines for Environmental Compliance
- Social compliance program with formal Code of Conduct policy and audits for prequalifying new factories with renewal schedules
- Investments in community



## ETHICS AND STANDARDS

Henbury work with the very highest level of manufacturers developing strong, long-term partnerships to promote understanding of International Ethical Trading practices. Working with all our global suppliers to promote respect for workers’ rights, ensuring workers are free from exploitation and discrimination, and 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 and supported with continuous monitoring by our local representatives. This ensures working conditions and practices are to 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 with which we work and manufacture.

## CERTIFICATIONS

Further information and clarification relating to various certifications and standards is available from us if required.



## 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 regards 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

As one of the world's leading garment manufacturers, we recognise our responsibilities to the environment and the community.

All of our garments whether made at our Moroccan manufacturing plant or sourced from third party suppliers are approved to Oeko-Tex Standard 100. This certifies that they contain no substances harmful to people or the environment. Oeko-Tex is an internationally renowned testing certification system for textiles. Test criteria are standardised across the world and include tests for ph-value, pesticides and heavy metals. Only when a garment is proved to contain no harmful substances is it granted Oeko-Tex approval.

In addition, all Fruit of the Loom facilities and those of our suppliers are WRAP certified. WRAP is an internationally recognised third party certification dedicated to ensuring lawful, humane and ethical manufacturing throughout the world.

As well as independent third party accreditations, we also have our own very stringent Code of Conduct, which applies not only to Fruit of the Loom, but to our suppliers, distributors and business partners. Our Code of Conduct, the Fruit Code, is more than a policy, it is a way of life.

## Code of Conduct

Fruit of the Loom (FOL) is committed to conducting our business in accordance with the highest standard of business ethics and respect for human rights. We require our suppliers, licensees, distributors and other business partners to meet these high standards.

We appreciate that other countries have different cultural, legal and ethical systems. However, the Fruit Code states that any facilities we use, whether owned by the company or our contractors, licensees or other business partners must always satisfy certain basic requirements.

**Compliance with Law:** FOL requires that all facilities operate in compliance with the requirements of applicable law.

**Health and Safety:** Conditions throughout the facilities must be safe, clean and meet or exceed requirements of all applicable laws and regulations regarding health and safety. Workers must also be trained and equipped to perform their jobs safely.

**Child Labour:** No person shall be employed at an age younger than the age for completing compulsory schooling in the country of manufacture, or the age consistent with International Labour Organisation guidelines, whichever is greater.

**Forced Labour:** The use of forced, compulsory, indentured or bonded labour is prohibited.

**Harassment or Abuse:** Facilities must treat all employees with respect and dignity and should have procedures in place to protect employees from physical, sexual, psychological or verbal abuse. In addition, facilities may not use monetary fines as a disciplinary practice.

**Discrimination:** Discrimination in hiring, pay, promotions, discipline, termination or other terms and conditions of employment based on personal characteristics, beliefs or other legally protected criteria, is prohibited.

**Working Hours:** Except in extraordinary business circumstances, employees shall (i) not be required to work more than the lesser of (a) 48 hours per week, and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture and (ii) be entitled to at least one day off in every seven-day period. All overtime work shall be optional. Employers shall not require overtime on a regular basis and shall compensate all overtime work at a premium rate.

**Wages and Benefits:** FOL requires that employees be fairly compensated by providing wages, including overtime pay, and benefits that meet or exceed all applicable laws and regulations.

**Freedom of Association:** FOL recognises and respects the rights of employees to freedom of association and collective bargaining and requires that all facilities recognise and respect the same.

**Environmental Compliance:** FOL requires compliance with all local and international laws protecting the environment, including proper storage and disposal of hazardous substances. In addition, business should be conducted in a manner that minimises all waste and energy consumption and maximises recycling.

**Subcontractors:** Facilities will not utilise subcontractors in the manufacturing of Company products or components without the Company's prior written approval and only after the subcontractor has agreed to comply with this Code of Conduct.

**Customs Compliance:** Facilities will comply with all applicable customs laws and establish and maintain programmes to safeguard against the illegal transshipment of products.

**Security:** Facilities will maintain security procedures to guard against the introduction of non-manifested cargo (drugs and other contraband) into shipments of our products.

**Posting Requirements:** This Code of Conduct must be posted in a visible location accessible to all employees and visitors (in the appropriate local language).

**Record Keeping:** Facilities must maintain complete and accurate records with respect to each of these elements to allow for verification of compliance with this Code of Conduct.

Enforcement FOL employs internal, as well as third party auditors, to ensure compliance with this Code at all locations conducting business for FOL. The Company maintains detailed records of all facilities' compliance with this Code of Conduct.



## GLENMUIR

Glenmuir and Sunderland believe in promoting an atmosphere of mutual trust, honesty and integrity between customers, associates and suppliers. We strive to achieve the highest possible standards in all working practices and expect our business partners to do the same. We seek partners who share their commitment to the promotion of best practice and continuous improvement.

Glenmuir and Sunderland are guided by the ETI base code, and require that our business partners adhere to these principles.

Before accepting a manufacturer as a new supplier they must demonstrate commitment to these principles by signing and returning a Manufacturer's Agreement.



As an experienced operator in a global economy, Hi-Tec Sports UK (including the Magnum Brand) recognizes the importance of respecting culture and the environment around the world. We believe that high business standards play a significant role in our continued success and growth, but we never lose sight of the responsibility that comes with this success.

The aim of this policy is to ensure that the impact of our activities is positive for all internal and external stakeholders and to achieve this, we will share good practice with customers, suppliers and employees for both their benefit and that of the wider community and environment.

## People

Our entire organization depends on its people, as well as those with whom we do business. Therefore, we operate an internal health and safety policy, but also an ethical code of conduct and these are detailed below. The ethical code of conduct is further enhanced by factory auditing.

## Health & Safety Policy

At Hi-Tec, we recognize and accept responsibility for providing a safe and healthy working environment for all our employees.

In addition, all reasonable steps will be taken to ensure that all work carried out by our employees does not adversely affect the health and safety of anyone else such as clients, suppliers, visitors, contractors or members of the public.

## The objectives of our Health & safety Policy are:-

- To apply standards of health, safety and welfare which comply fully with the requirements of regulations or statutory provisions in all countries of operation
  - To maintain a safe and healthy working environment with safe systems of work and to maintain means of access to the premises that are safe and without risk
  - To protect staff and visitors from foreseeable hazards whilst on company premises or on company business
- To develop safety awareness amongst staff by providing them with sufficient information, instruction, training and supervision to allow them to work safely
- To make employees aware of their individual responsibility to take care of themselves and others and to co-operate with management in matters of safety
  - To encourage full and effective consultation with staff on health and safety matters

## ETHICAL CODE OF CONDUCT

### General Commitment

Hi-Tec and all business partners that are involved with the operation of Hi-Tec whether sourcing product,

manufacturing or subcontracting, must follow and sign up to an equal code of conduct, providing a guaranteed understanding, compliance and implementation:

### **Child Labour**

Use of child labour strictly prohibited and will not be tolerated by Hi-Tec. Child labour is defined as any worker who has not yet reached the legal age at which compulsory schooling has ended, or 15 years of age whichever is greater. Hi-Tec will not use manufacturers who use child labour in any of their facilities and will not accept goods from manufacturers that utilise child labour in any manner, including in their contracting, subcontracting or other relationships.

### **Prison, Forced or Compulsory Labour**

The use of prison, forced or other compulsory labour is strictly prohibited.

### **Human Rights**

Hi-Tec is committed to ensuring that the obligation of Human Rights legislation, including the European Convention of Human rights are fully met by both by ourselves and all of our sub-contractors and suppliers.

### **Compensation**

Wages must comply with local and national minimum wage, or the prevailing industry wage, whichever is higher.

### **Benefits**

Benefits must comply with all provisions for legally mandated benefits including but not limited to housing, meals, transportation and other allowances; healthcare, child care, sick leave, emergency leave, pregnancy and menstrual leave; vacation, religious, bereavement and holiday leave; and contributions for social security, life health, worker's compensation and other insurance.

### **Hours of Work/Overtime**

Working hours must comply with legally mandated work hours. Employees working overtime are to be fully compensated according to local law. An employee must be informed at time of hire that mandatory overtime is a condition of employment and that on a regularly scheduled basis is provided one day off in seven. Also, the employee is required to work no more than 60 hours per week, or less, if local limits are lower.

### **Health and Safety**

All contract factories manufacturing Hi-Tec products must provide a working environment that is safe. This commitment includes adequate fire exits and well-lit workstations. They must also certify that they have written health and safety guidelines, including those applying to employee residential facilities, where applicable. Every employee should be treated with respect and dignity. No employee may be subject to any physical, sexual, psychological or verbal harassment or abuse.

Manufacturers must comply with all applicable local environmental regulations and their endeavour to restrict the use of chlorofluorocarbons (CFCs). Manufacturers must agree to maintain documentation to demonstrate

compliance with Hi-Tec standard operational procedures.

Similarly, our UK operation is committed to operates fully in line with our corporate policy:

Hi-TEC Sports recognizes and accepts responsibility for providing a safe and healthy working environment for all its employees.

In addition, all reasonable steps will be taken to ensure that all work carried out by its employees does not adversely effect the health and safety of anyone else such as clients, suppliers, visitors, contractors or members of the public.

### **The objectives of the Hi-Tec Sports group of companies Health & safety Policy are:**

- To apply standards of health, safety and welfare which comply fully with the requirements of the Health and Safety at Work Act 1974 and all associated regulations or statutory provisions
- To maintain a safe and healthy working environment with safe systems of work and to maintain means of access to the premises that are safe and without risk
- To protect staff and visitors from foreseeable hazards whilst on Company premises or on company business
- To develop safety awareness amongst staff by providing them with sufficient information, instruction, training and supervision which they need to work safely
- To make staff aware of their individual responsibility to take care of themselves and others and to co-operate with management in matters of safety
- To encourage full and effective consultation with staff on health and safety matters

### **Legal**

Manufacturers making Hi-Tec products must observe all laws of the applicable country including the laws that relate to employment, discrimination, safety and health. If local or industry practices exceed local legal requirements, the higher standard must be met.



J. HARVEST & FROST  
CORPORATE SHIRTMAKER

## **CODE OF CONDUCT FOR SUPPLIERS**

### **Introduction**

For many companies, it is becoming more and more important to respect different countries' legal demands as well as international organisations' views of fundamental rights. When choosing supplier this should be of great importance.

For Text AB it is important to take responsibility for our activities both in Europe as well as in the rest of the world. This way, we clarify and show our ethical and moral standpoint. We are convinced that this forms the basis of long-term development and good business

relations with our customers.

This code of conduct applies to all factories involved in the manufacture of Products to the Buyer. The Buyer is Textet AB. The Products include Textet's four brands; James Harvest Sportswear, Printer Active Wear, Mac One and Jingham.

While Textet recognises that there are different legal and cultural environments in which factories operate through out the world, this code sets forth the basic requirements all factories must meet in order to do business with Textet.

### 1. General Principles and Legal Demands

Factories that manufacture products for Textet shall operate in full compliance with the laws, rules and regulations of the respective countries, such as labour legislation, working environment regulations, restrictions of environmental pollution, and with other applicable laws, rules and regulations.

- The factories shall operate in full compliance with all applicable laws, rules and regulations, including those relating to labour, workers health and safety
- The factories shall allow Textet and/or any of its representatives unrestricted access to its facilities and to all relevant records at all times, whether or not notice is provided in advance by Textet

### 2. Discrimination

Factories shall employ workers on the basis of their ability to do the job, and never on the basis of their personal characteristics or beliefs.

- The factories shall employ workers without any regard what so ever to race, colour, gender, nationality/ethnic background, religion, sexual preferences, maternity, marital status or any other personal characteristics
- The factories shall pay workers wages and provide benefits without any regard what so ever to race, colour, gender, nationality, religion, age, maternity, marital status or any other personal characteristics

### 3. Child Labour

Factories shall not use child labour, in violation with the local laws of the country of manufacturer or by the United Nations convention of the Rights of the Child.

Factories are encouraged to develop a lawful workplace apprenticeship programs for the educational benefit of their workers, provided that all participants meet the minimum legal age requirement.

- Every worker employed by the factory shall meet the applicable minimum legal age requirement
- The factories comply with all applicable child labour laws, including those related to hiring, wages, working hours, overtime and working conditions
- The factory shall maintain official documentation for every worker that verifies the workers date of birth

### 4. Wages and working hours

Factories shall set working hours, wages and overtime compensation in compliance with all applicable local laws. Workers shall be paid at least the minimum legal

or the local industry standard, whichever is greater. While it is understood that overtime work often is required in garment production, factories shall carry out operating in ways that limit overtime to a level that ensures human and productive working conditions.

- Workers are paid at least the minimum legal wage or the local industry standard, whichever is greater
- The factory pays overtime compensation that meets all legal requirements or the local industry standard, whichever is greater
- The factory does not require, on a regularly scheduled basis, a workweek in excess of 60 hours
- Workers have at least one day off, of every week of seven days
- The factories provide paid annual leave, sick leave, maternity leave or other holiday as required by law or which meet the local industry standard, whichever is greater
- The factories provide workers with wage statement for every period, which include number of days worked, wage or piece rate earned per day, hours of overtime and overtime compensation, bonuses, allowances and legal contractual deductions, if any

### 5. Working conditions

Factories must treat all workers with respect and dignity and provide them with a safe and healthy environment. Factories shall comply with all applicable local laws and regulations regarding working conditions. Factories shall not use corporal punishment or any other form of physical or psychological coercion. Factories must be sufficiently and ventilated.

- The factory does not engage in or permit physical acts to punish or coerce workers
- The factory does not engage in or permit psychological coercion or any other form of non-physical abuse, including threats of violence, sexual harassment, or other abuse
- The factory complies with all applicable local laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection and electrical, mechanical and structural safety
- The factory is sufficiently ventilated; there are windows, fans and/or air conditioners and/or heaters in all work areas for adequate circulation, ventilation and temperature control
- There are sufficient, clearly marked exits allowing for the orderly evacuation of workers in case of fire or other emergencies; Exits are kept free from obstructing objects and remain accessible and unlocked during all working hours
- Fire extinguishers are regularly maintained and charged and kept visible and accessible for all workers
- The factories provide adequate drinking water for all workers and allow reasonable access to it through out the working day
- The factories maintain through out the working hours clean and sanitary toilet areas and puts on reasonable restrictions on their use

## 6. Freedom of association

Workers are free to join associations of their own choice. Factories must not interfere with workers who wish to lawfully and peacefully associate, organise or bargain collectively. The decision whether or not to do so should be made solely by the workers.

KARIBAN KARIBAN SPASO Kariban Vintage

Ki-mood PROACT.®

## CODE OF CONDUCT FOR SUPPLIERS

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 recognize 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.

### 1. Compliance with Law

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.

### 2. Child Labour

No person shall be employed at an age younger than the age for completing compulsory schooling in the country of manufacture, or the age consistent with International Labour Organization guidelines, whichever is greater. All our authorized 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.

### 3. Forced Labour

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

### 4. 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.

## 5. Harassment or Abuse

Corporal punishment or other forms of harassment, abuse or coercion, whether verbal, mental, physical or sexual, are strictly forbidden.

## 6. 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.

## 7. Environmental Compliance

We require that all facilities comply with all local laws and regulations regarding environmental protection. In addition all facilities should work to minimize all waste and maximize recycling where possible, and to ensure proper storage and disposal of hazardous substances.

## 8. 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.

## 9. Freedom of Association

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

## 10. 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.



KOOGA  
MADE FOR RUSSY

Kooga Standards are written in line with the Kooga Code of Conduct, which will ensure that quality workplace conditions are maintained. Factories are responsible for compliance with applicable laws and regulations, however, these Standards may in some cases provide for more stringent regulation of workplace conditions.

It is the intention of Kooga that all factories apply the



local law as the MINIMUM standard and in some cases this will be equivalent or better than this code.

Factories that wish to outsource or subcontract work on our products must obtain prior authorisation for outsourcing or subcontracting from us. Complete information about the subcontractor should be provided in a timely manner. Subcontractors are expected to comply with our Standards.

These guidelines translate our Standards into operational language for employees and factory managers to assist in preparing factory for compliance. Each Standard is divided into subsections with explanatory text that clarifies the detail behind the topic.

In assessing workplace conditions, it is important to recognise that direct interviews with workers are an essential component of monitoring. Interviews are best conducted by local nationals speaking in the local language away from production lines.

To achieve implementation of this policy, Kooga require that suppliers allow full knowledge and access of the production facilities used.

An essential part of achieving factory compliance with these Standards is education. All factory managers and supervisors should receive training in the Standards. Kooga recommend that all workers, as part of their induction are informed about their rights and obligations as defined by this code and applicable labour laws.

Factories producing Kooga products will publicise and enforce a non-retaliation policy that permits factory workers to speak with staff without fear of retaliation by factory management.

Kooga object strongly to the use of force to suppress any of their Standards and will take any such actions into account when evaluating factory compliance.

Factories producing Kooga goods must post the Code of Conduct in all units, translated into the language of the worker.



Sport can reach across social, political and geographical borders, thus affecting people all over the world and the environment in which they live. Since ever Lotto has been living sport intensively by contributing to its development and transmitting passion for sport as a moment of physical growth, fun and an occasion for socializing. In recent years, Lotto has also been involved in social projects to which the company is strongly committed and which will become even more intensive in the next years.

## ACTION

Lotto has always given full attention to social issues and, above all, the safety and fair treatment of personnel involved in manufacturing, wherever they work in the world. With this regard, Lotto adheres to major international organizations like WFSGI and FESI, which are the World and the European Federations of the Sporting Goods Industry. For years these federations have been promoting the respect of human rights as well as other important issues such as health and security among their members. In particular the WFSGI has formed an international CSR committee with the objective to attain a global approach and a common vision and strategy for the entire sports industry worldwide. This committee includes members of important international brands such as Adidas, Asics, Mizuno, New Balance, Nike, Pentland Group, Puma, Reebok, Umbro as well as Lotto, with the participation of Gianni Lorenzato, Executive Vice-President of Lotto Sport Italia.

## ENVIRONMENT

Lotto is convinced that protecting the environment is a commitment and a responsibility a company has toward its stakeholders. Attention to costs is carefully balanced by an efficient use of resources, energy conservation, use of recycled paper and cardboard packaging, as well as the reduced use of polluting materials in production, etc. All this means a better use of raw materials, less wastage, and decreased waste material and harmful emissions, which have become an essential part of the Lotto philosophy and its corporate production.

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**maddins**

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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.



## 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 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.



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.

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**NIMBUS®**  
SCANDINAVIAN APPAREL

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## Appendix 1 - Code of Conduct

This appendix is intended to support the implementation of Nimbus Nordic A/S' policy regarding business ethics, social and environmental performance, by describing the basic requirements which Nimbus Nordic A/S has towards our suppliers. This list can be used by The Supplier to conduct self assessments, and will be used by Nimbus Nordic A/S to verify or audit suppliers in accordance with the requirements specified below. Our Code of Conduct is primarily inspired by the Global Compact principles.

## HUMAN RIGHTS

### 1. Discrimination

The Supplier must ensure that no discrimination based on race, national or social origin, caste, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age exist. No discrimination in hiring, remuneration, access to training, promotion, termination, and retirement. No interference with exercise of personnel tenets or practices; prohibition of threatening, abusive, exploitative, coercive behavior at workplace or company facilities; no pregnancy or virginity tests under any circumstances

### 2. Respect of Human rights

The Supplier has a responsibility to respect human rights, that is, not to infringe human rights. The Supplier must ensure that the company's activities and relationships do not deliberately risk that the supplier might negatively impact human rights.

## LABOUR

### 3. Health and Safety Standards

The Supplier shall ensure that its workers are offered a safe and healthy working environment, including, but not limited to, protection from fire, accidents and toxic substances. Adequate health and safety policies and procedures must be established and followed.

### 4. Training and Protective Gear

The Supplier shall provide its employees with the

protective equipment and training necessary to perform their tasks in a safely manner.

## **5. Sanitary Infrastructure**

The Supplier must provide a suitable, clean and sanitary infrastructure, including access to toilets and potable water, which conforms to the needs of its employees and is adequate to its numbers.

Accommodation, if provided by The Supplier, shall conform to the same requirements, including the general provisions on health and safety listed above.

## **6. Child Labor and Young Workers Minimum Age Requirements**

The Supplier shall not engage in, or benefit from, the use of child labor. The minimum age for employment shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years (or 14 years where established by national laws in accordance with the ILO developing-country exception).

## **7. Light work and Apprenticeship Programmes**

Where permitted by national laws, The Supplier may employ children between 12 and 15 years to perform a few hours of light work per day. The work must be simple tasks of a limited nature and not interfere with the children's educational responsibilities. Apprenticeship programmes for children below the minimum age of employment must be remunerated and the programme must be clearly aimed at training.

## **8. Hazardous and Harmful Work**

The Supplier shall refrain from hiring young workers (below 18 years of age) to perform any type of work, which is likely to jeopardize their health, safety or morals.

## **9. Freedom of association**

The Supplier must respect the right to form and join trade unions and bargain collectively. All personnel are free to: organize trade unions of their choice; and bargain collectively with their employer. The Supplier shall: respect right to organize unions & bargain collectively; not interfere in workers' organizations or collective bargaining; inform personnel of these rights & freedom from retaliation; where law restricts rights, allow workers freely elect representatives; ensure no discrimination against personnel engaged in worker organizations; and ensure representatives access to workers at the workplace.

## **10. Working Time**

The Supplier will comply with national and local laws & industry standards.

## **11. Guaranteed Minimum salaries**

The supplier must comply with the local rules for minimum wages for all employees.

## **12. Forced and Compulsory Labor**

The Supplier will make no use or support for forced or compulsory labor; no required 'deposits' - financial or otherwise; no withholding salary, benefits, property or documents to force personnel to continue work; personnel right to leave premises after workday; personnel free to terminate their employment; and no use nor support for human trafficking.

## **ENVIRONMENT**

### **13. Use of chemical substances**

The Supplier guarantees that the deliveries comply with the European "REACH" - Regulation (EU Regulation 1907/2006). This applies for both products and packaging materials. The Supplier must be able to present a statement of compliance on Nimbus Nordic's request within 10 weekdays.

### **14. Operational code of conduct and product approval**

The Supplier must develop a code of conduct or practice for its operations and products that confirms commitment to care for health and the environment in order to ensure that irreversible environmental damage does not occur. The Supplier must ensure to obtain prior approval before certain products, deemed to be potentially hazardous, may be developed.

## **ANTI CORRUPTION**

### **15. Anti corruption prevention**

The Supplier should avoid bribery, extortion and other forms of corruption. When possible, The Supplier should also develop policies and concrete programs to address corruption

### **Appendix 2: REACH regulation for import of products to EU**

Supplier's Declaration on Substances of Very High Concern in (SVHC) articles, cf. REACH Regulation, EC 1907/2006

When Nimbus Nordic A/S imports products to EU we must make sure that our suppliers meet the obligations arising from the REACH regulation. This request should therefore be considered part of our continuous supplier/customer dialogue, which is a natural consequence of the new legislation.

The REACH regulation, describe certain requirements that must be fulfilled on documentation concerning Substances of Very High Concern (SVHC) in articles. For that reason, we must ask our suppliers to state, whether the articles we buy contain SVHC, and if they do, in which quantities. We additionally ask our suppliers to guarantee that all products are AZO free and we request that our suppliers also ensure that sub suppliers also comply with these standards. This applies for sub suppliers which supply materials used for the productions and for sub suppliers which are directly involved in the production of articles produced for Nimbus Nordic A/S.

If Nimbus Nordic A/S do not get the information from our suppliers, it will not be possible for us to obey the law for the products we market inside the EU. The main idea according to the REACH Regulation is: "No data, no market".

Nimbus Nordic A/S needs to have a declaration on the use of SVHC substances in all the products we buy from you. The declaration must cover both the product and the packaging materials. The requirement applies to SVHC substances in concentrations above 0.1%.

If various tests of the product have already been conducted and presented through test reports or other forms of documentation we would be glad to receive them. On the other hand we would like to stress that it is not required to have performed tests for every single product. Your declaration is sufficient evidence for the quality of your products.



## SUPPLIER CITIZENSHIP POLICY

### Introduction

Ogio is dedicated to operating ethically, protecting the environment and supporting the communities in which we do business. Our associates are guided by our Code of Conduct, which is based on our key beliefs of uncompromising integrity, values and our constant respect for people. These key beliefs are vital to the success of Ogio. To support this success, Ogio Supplier Citizenship Policy establishes guidelines that respect human rights, workplace safety and protection of the environment.

### Ogio Supplier Citizenship Policy Elements

1. Working Conditions / Health and Safety
2. Child Labor
3. Forced Labor
4. Discrimination
5. Harassment and Abuse
6. Freedom of Association and Collective Bargaining
7. Working hours
8. Wages and Benefits
9. Environmental
10. Management Systems
11. Suppliers / Contractors

#### 1. Working Conditions / Health and Safety

- Employees must be provided with safe and healthy working environment. The supplier will take adequate steps as appropriate to reasonably prevent and

minimize accidents and injuries to health within the workplace. The supplier will provide adequate means of evacuation and training to employees in emergency preparedness

- Personnel should receive appropriate training on safety and health concerns in the workplace. Such training should be documented and include newly hired and reassigned employees
- If provided, the supplier will ensure that dormitory facilities are clean, safe and meet the basic needs of employees

#### 2. Child Labor

- All workers must meet or exceed the local minimum age law requirements, but in no event shall workers under 16 years of age be employed. Depending on the nature of the work and being performed, the supplier may seek to limit employment to workers over 18 years of age

#### 3. Forced Labor

- The supplier will not allow the use of forced, bonded or involuntary prison labor

#### 4. Discrimination

- The supplier shall prohibit engaging in or supporting discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, national origin, caste, sexual orientation, religion, age, gender, disabilities, political affiliation or veteran status
- The supplier shall respect employee's observance of tents or practices relating to race, national origin, caste, sexual orientation, religion, age, gender, disabilities, political affiliation or veteran status

#### 5. Harassment and Abuse

- The supplier shall prohibit behavior, including gestures, language and physical contact, that is sexually coercive, threatening, abusive or exploitative. These abuses include, but are not limited to, sexual harassment, corporal punishment, mental or physical coercion, and physical abuse

#### 6. Freedom of Association and Collective Bargaining

- Supplier must recognize and respect their employee's rights to freedom of association and to enter into collective bargaining units

#### 7. Working Hours

- Suppliers will comply with applicable local laws and industry standards on working hours, however, employees must not work more than 12 hours in a day and 6 days in a week for more than 3 consecutive weeks
- In addition to compensation for regular hours of work, employees shall be compensated for overtime hours at such premium rate as is legally required in the country of manufacture, or in those countries where such laws do not exist, at a rate at least equal to their regular

hourly compensation rate

## 8. Wages and Benefits

- The wages and benefits offered to employees must meet or exceed the local legal minimum laws and standards
- Employees must be provided with clear information about their wages and benefits on a regular basis

## 9. Environmental

- Suppliers will conduct their business activities such that it is in compliance with applicable environmental laws, norms and regulations
- Suppliers will provide protection of the environment and the conservation of natural resources

## 10. Management Systems

- A supplier's local policy shall be consistent with the requirements set forth in the Ogio Supplier Citizenship Policy and communicated to its employees. If the supplier does not have a local policy, it shall communicate the contents of the Ogio Supplier Citizenship Policy to its employees
- The supplier's management system shall include practices to include investigating, addressing and responding to the concerns of employees with regard to compliance with this policy. The supplier shall refrain from disciplining or otherwise discriminating against any employee for providing information concerning the supplier's compliance with the Ogio Supplier Citizenship Policy
- The supplier will periodically review the adequacy, suitability and continuing effectiveness of the systems implemented to meet the requirements of the Ogio Supplier Citizenship Policy. The supplier will implement appropriate corrective actions to address any identified non-conformance

## 11. Supplier and Contractors

- Ogio suppliers will establish and maintain appropriate procedures to evaluate and select their suppliers and contractors, and where appropriate, their sub-suppliers and sub-contractors, on their ability to demonstrate evidence of conformance with the requirements of Ogio Supplier Citizenship Policy
- Ogio suppliers will maintain reasonable evidence that the requirements of the Ogio Supplier Citizenship Policy are being met by their suppliers and contractors, and, where appropriate, by their sub-suppliers and sub-contractors. This evidence may include certification forms, written questionnaires, audits, inspections or the other appropriate documentation



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.



At Premier, we aim to achieve the highest ethical and environmental standards and we only like to work with manufacturers that do the same. To make sure our credentials are impeccable we have a detailed code of conduct that's integral to the way we do business and all our suppliers and their sources must sign up to it. It's based on the very best employment ethics, health and safety practices and environmental considerations. So when you purchase any of our goods you can be sure that they have been produced lawfully, through fair and honest dealing, in decent working conditions and without exploiting the people who made them. Any environmental impact during production and transportation has also been kept to a minimum.

Premier also has the right to run audits and spot checks, personally or via external parties, on our suppliers' premises without their prior knowledge to verify that they



are behaving in an appropriate manner and upholding our values. Just one more way that you can trust us to make a difference to people and the planet.

All our factories are WRAP OR BCIS approved.



## ENVIRONMENTAL AND ETHICAL TRADING POLICY STATEMENTS

### General Statement of environmental principals

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 environmental 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



## THE HONESTY PROJECT

The Regatta group is a family business with a strongly believed set of values.

We deeply believe that honesty, courtesy and respect are critical in all the decisions we make wherever that may be – with customers, colleagues and the workers in our factories.

We set up the Honesty Project to 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're not perfect yet but we're striving to be committed to honesty and transparency in everything we do, every step of the way.

### Responsible sourcing

We have been members of Ethical Trade Initiative since 2012. ETI brings together brands, retailers, suppliers, unions and NGO's to improve conditions for workers worldwide. We have recently been awarded Achiever status which makes us one of ETI's top companies.

We impact 32000 workers in 95 factories in 7 countries.

## SOCIAL IMPACT PROGRAMMES

Our RHEP project teaches female health, hygiene and nutrition. By the end of 2017 we will have trained over 7000 workers, who in turn teach neighbours and friends. We do this through a system of peer educators; teaching workers to be health educators who then cascade their learning.

## THE REGATTA GROUP SCHOOL

For over 10 years, we have been funding a primary school in our garment factory area, with 262 disabled and disadvantaged children, aged from 4 to 14.

As well as essential building refurbishment, we are also reviewing the curriculum with Save the Children where we plan to introduce a numeracy and literacy booster scheme and a programme to help educate the parents.

Key to our success is that we provide a balanced meal and milk for every child, every day. We are proud of the positive impact we have made to over 3000 families to date.

## THE ENVIRONMENT

Understanding the impact our activities have on our natural environment is important. It is imperative we reduce our harmful effects where possible. We have a detailed business plan, with key dates and targets. These include reducing CO2 emissions, reducing water usage, waste and chemical management, using

more sustainable packaging and component parts and switching to "blue sign" certified fabrics wherever possible.

We are 100% compliant with all European legislation regarding banned substances and are also working towards a reduction of PFC's by 2020.



## POLICY & ENVIRONMENTAL RESPONSIBILITY

### Corporate Responsibility

At RESULT® we see corporate responsibility as key in how we conduct our business and believe it makes good sense to run our business in a responsible way with regards: Minimum Age Labour. RESULT® does not permit the employ of workers under the minimum age established by local law or below compulsory school-going age, whichever is greater. In no case shall RESULT® permit the employ of individuals under the age of 16.

### Working Conditions

RESULT® requires that all authorised garments bearing its name be manufactured under conditions which adhere to strict standards on working hours and good working conditions, including factory temperature. RESULT® requires all suppliers to employ based on equal opportunity and non-racist policies. Developing healthy links with communities in which we operate within the UK and overseas by creating opportunity, skill development and support in emerging economies. Needle & Nickel Detection. Junior and youth garments are submitted to stringent needle detection procedure by metal detector prior to packing at source. All garments are tested to ensure all trims are nickel-free.

RESULT® Assurance. RESULT® delivers value to our customers with its assurance of excellence but we will gladly repair, replace or refund any garment which has a genuine manufacturing fault. When a garment is accepted back for our quick turnaround repair service, RESULT® asks customers to ensure the garment is clean, particularly when the garment has been in contact with animals or chemicals. RESULT® reserves the right not handle or repair any garment which it feels would compromise the health and safety of its operatives. If it is our opinion your garment has been subjected to abnormal wear and tear, misuse, alteration or accidental damage, you will have to put it down to the experience.

## Brochure Colour Reproduction

RESULT® designers take great care with garment colour in our brochures. Limitations of media print may mean shade variations with images. Pantone references are supplied for guidance only.

## Product Description

Every reasonable care has been taken to ensure that the descriptions are accurate. However, specifications may change & RESULT® reserve the right to do so where necessary. All garment styles are protected by copyright owned by RESULT® Clothing Limited and their reproduction in any form without the express consent of the copyright holder will be actioned as an infringement under copyright law.

## Purchaser Responsibility

RESULT® products are designed to be worn and all statements, technical information and recommendations herein are based on tests we believe to be reliable. However the accuracy or completeness thereof is not guaranteed so before use, the user must determine the suitability of the product for its intended use, as the user assumes all risk and liability whatsoever on connection therewith.

## Decorator Responsibility

RESULT® products are designed to be decorated and all statements, technical information and recommendations herein are based on tests we believe to be reliable & can only be taken as an indication of how the garments may perform. However, accuracy or completeness thereof is not guaranteed so before use, the decorator must determine the suitability of the product for the decoration. Printers in particular employ different techniques and use a variety of products so RESULT® does not take responsibility for third party garment decoration and always recommends testing before bulk decoration.

All styles offered are subject to availability.

## Environmental Practices

RESULT® demands all suppliers pursue correct environmental practice, including the recycling of waste materials and the re-circulation of waste heat generated in the dyeing process. RESULT® insists on the use of dyed fabric free from harmful substance in all products.

Recycling: As innovations to fabric recycling evolve, RESULT® reserves the right to make running changes to any styles where recycling can enhance performance or lessen environmental impact. All garments using recycled materials within their make-up are marked in this brochure. Recycled bag and packaging is used, together with any other recycled materials on labelling & promotional literature, where possible.

REACH: RESULT® encourages all suppliers to have full compliance with REACH (Registration, Evaluation, Authorisations and Restriction of Chemicals) and ensure no substances harmful to any human or the environment are used in products bearing the RESULT® brand.

Trade Associations

RESULT® is member of the following associations:

REMA: The Retro-re effective Manufacturers Association monitors all retro-re effective items including Safety clothing and footwear, particularly in the EN471 categories.

NCWA: The National Children's Wear Association monitors safety in the design of all aspects of children's wear.

SEDEX: The Supplier of Ethical Data Exchange is a membership organisation for businesses committed to continuous improvement of the ethical performance of their supply chains.

## Garment Sizes

Garment sizes indicated are approximate to fit sizes & for guidance only.

Where multi-language translation appears in any RESULT® literature English translation prevails.



At Russell Europe we make great garments and we make them the right way. All of our production facilities are independently certified by WRAP, the world's responsible production accreditors, for adherence to international ethical standards.

The entire Russell Europe range conforms to Oeko-Tex 100 standards, which verify that no illegal or harmful substances are used in the production of any of our garments.

As well as independent third party accreditations, we also have our own very stringent Code of Conduct, which applies not only to Russell Europe and Fruit of the Loom Inc., but to our supplier, distributors and business partners. Our Code of Conduct, the Fruit Code, is more than a policy, it is a way of life.

## Code of Conduct

Fruit of the Loom (FOL) is committed to conducting our business in accordance with the highest standard of business ethics and respect for human rights. We require our suppliers, licensees, distributors and other business partners to meet these high standards.

We appreciate that other countries have different cultural, legal and ethical systems. However, the Fruit Code states that any facilities we use, whether owned by the company or our contractors, licensees or other business partners must always satisfy certain basic requirements.

**Compliance with Law:** FOL requires that all facilities operate in compliance with the requirements of applicable law.

**Health and Safety:** Conditions throughout the facilities must be safe, clean and meet or exceed requirements of all applicable laws and regulations regarding health and safety. Workers must also be trained and equipped to perform their jobs safely.

**Child Labour:** No person shall be employed at an age younger than the age for completing compulsory schooling in the country of manufacture, or the age consistent with International Labour Organisation guidelines, whichever is greater.

**Forced Labour:** The use of forced, compulsory, indentured or bonded labour is prohibited.

**Harassment or Abuse:** Facilities must treat all employees with respect and dignity and should have procedures in place to protect employees from physical, sexual, psychological or verbal abuse. In addition, facilities may not use monetary fines as a disciplinary practice.

**Discrimination:** Discrimination in hiring, pay, promotions, discipline, termination or other terms and conditions of employment based on personal characteristics, beliefs or other legally protected criteria, is prohibited.

**Working Hours:** Except in extraordinary business circumstances, employees shall (i) not be required to work more than the lesser of (a) 48 hours per week, and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture and (ii) be entitled to at least one day off in every seven-day period. All overtime work shall be optional. Employers shall not require overtime on a regular basis and shall compensate all overtime work at a premium rate.

**Wages and Benefits:** FOL requires that employees be fairly compensated by providing wages, including overtime pay, and benefits that meet or exceed all applicable laws and regulations.

**Freedom of Association:** FOL recognises and respects the rights of employees to freedom of association and collective bargaining and requires that all facilities recognise and respect the same.

**Environmental Compliance:** FOL requires compliance with all local and international laws protecting the environment, including proper storage and disposal of hazardous substances. In addition, business should be conducted in a manner that minimises all waste and energy consumption and maximises recycling.

**Subcontractors:** Facilities will not utilise subcontractors in the manufacturing of Company products or components without the Company's prior written approval and only after the subcontractor has agreed to comply with this Code of Conduct.

**Customs Compliance:** Facilities will comply with all applicable customs laws and establish and maintain programmes to safeguard against the illegal transshipment of products.

**Security:** Facilities will maintain security procedures to guard against the introduction of non-manifested cargo (drugs and other contraband) into shipments of our products.

**Posting Requirements:** This Code of Conduct must be posted in a visible location accessible to all employees and visitors (in the appropriate local language).

**Record Keeping:** Facilities must maintain complete and accurate records with respect to each of these elements to allow for verification of compliance with this Code of Conduct.

Enforcement FOL employs internal, as well as third party auditors, to ensure compliance with this Code at all locations conducting business for FOL. The Company maintains detailed records of all facilities' compliance with this Code of Conduct.



RTXtra only do business with partners that share the company's adherence to high legal, ethical and moral standards. RTXtra's 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 business partners are expected to comply with RTXtra's code of conduct and to assure compliance in all contracting, subcontracting or other relationships. With these guidelines, RTXtra believes it is 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 conduct.

Our code of conduct has been developed to ensure consistent compliance by all suppliers and vendors. RTXtra recognise that the code of conduct will also assist management in selecting business partners that follow work place standards and practices consistent with RTXtra's principles.



All suppliers, vendors and business partners must comply with RTY's Operating Principles and assure compliance in all contracting, subcontracting or other relationships. With these guidelines, RTY believes it is exercising its economic leverage with business partners effectively to encourage their compliance with all laws designed to protect employees and supporting standards of business conduct at the highest level.

RTY's goal is to create model operations that provide jobs at fair wages and improve conditions in communities. RTY will only do business with vendors and suppliers that share the company's adherence to high legal, ethical and moral standards.

Our guidelines were designed to ensure consistent compliance by suppliers and vendors. RTY recognises that these Guidelines assist management in selecting business partners and maintain work place standards and practices consistent with RTY's Operating Principles.



## CODE OF CONDUCT

### INTRODUCTION

Hultafors Group AB (HG) develops, manufacture, market and sell products under the brands of HULTAFORS TOOLS, FISCO, SNICKERS WORKWEAR, WIBE LADDERS, SOLID GEAR, TOE GUARD AND DUNDERDON.

HG requires all its suppliers and subcontractors to comply with local laws as well as relevant conventions of the International Labour Organisation (ILO) as specified in this Code of Conduct. These are the minimum requirements which HG expect each supplier and subcontractor to meet.

HG code of conduct is an integral component of how HG approaches sourcing strategies, evaluates factory performance, and determines with which factories

HG will continue to engage and grow its business.

### 1. HUMAN RIGHTS

HG support and respect the protection of internationally proclaimed human rights. We make sure that we are not complicit in human rights abuses.

### 2. LABOUR STANDARDS

#### 2.1. Freedom of association

As far as any relevant laws allow, all employees are free to form and to join or not to join trade unions or similar external representative organizations and to bargain collectively.

#### 2.2. Forced labour

Forced, bonded or compulsory labour is not used and employees are free to leave their employment after reasonable notice as required by national law or contract. Employees are not required to lodge deposits of money or identity papers with their employer.

### 2.3. Employment conditions

Employees understand their employment conditions. Pay and terms are fair and reasonable, and comply at a minimum with national laws or industry standards whichever is higher. Working hours comply with national laws and are not excessive.

### 2.4. Child labour

No person is employed who is below the minimum legal age for employment. Minimum age is the age of completion of compulsory schooling, or not less than 15 years (or not less than 14 years, in countries where educational facilities are insufficiently developed) as set out in Article 2.4 in the ILO Convention No.138 on Minimum Age. Children are not employed for any hazardous work, or work that is inconsistent with the child's personal development. A child means a person below the age of 18 years, as defined in Article 1 of the United Nations Convention on the Rights of the Child.

### 2.5. Elimination of discrimination

Employees are treated with respect and dignity. Corporal punishment, physical or verbal abuse or other unlawful harassment and any threats or other forms of intimidation are prohibited. All kinds of discrimination based on partiality or prejudice is prohibited such as discrimination based on race, colour, sex, sexual orientation, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, indigenous status, disability, age, union membership and any other characteristic protected by local law, as applicable.

### 2.6. Working conditions

A healthy and safe working environment, and if applicable, housing facilities are provided for employees, in accordance with international standards and national laws. Appropriate health and safety information and training is provided to employees. Safety includes e.g. clearly marked and unblocked exits, emergency exits and evacuation plans on each floor, regularly tested fire alarm and evacuation drills, first aid equipment, safe and correct handling, marking and labelling of chemicals, machinery and work processes. The workplace, and if applicable, housing facilities, has tolerable temperature and noise level, adequate ventilation, sufficient lighting, clean toilet facilities, drinkable water and, if applicable, sanitary facilities for food storage.

### 3. ANTI CORRUPTION

No form of extortion and bribery, including improper offers for payments to or from employees, or organisations, is tolerated.

### 4. COMPLIANCE

HULTAFORS GROUP requires the Supplier and its subcontractors to comply with the CODE OF CONDUCT, which may request higher standards than required by national laws. Upon request, a Supplier must, by way of providing information and/or allowing access to premises to HULTAFORS GROUP or its representative, verify to HG's reasonable satisfaction, that the Supplier and its subcontractors comply with the CODE OF

## CONDUCT.

### 5. OBLIGATION TO INFORM

It is the responsibility of the Supplier to ensure that its employees and subcontractors are informed about and comply with the CODE OF CONDUCT.



#### OurWorld Production Code

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.



#### Our Fair Trade Policy

SDL Group Ltd deals exclusively with fair trade producers. Our suppliers make sure all artisans receive a fair wage for their work. In addition, our partner artisans receive advice and assistance in marketing their goods, financial assistance to finance raw materials for large orders, guaranteed prompt payment after the production is finished and guidance as to how to best incorporate technology and increase production efficiency into their workshop operations. Artisans also receive help in forging links with other training organisations that can provide additional technical assistance on a programmatic basis.

We are highly selective, and only engage in business contracts that bring the maximum benefit to our suppliers and our customers. We choose suppliers only if they meet the following criteria:

- They must be marginalised workers, in need of a fairer and more sustainable income than they have received in the past
- There must be complete transparency of commercial relations
- They must be based in developing countries
- Once we have selected our supplier, we honour our contract with them in the following ways:
- All orders are pre-paid, so the artisans have the cash-flow to buy all necessary materials
- The trading relationship is established on a long-term basis, in order to allow the artisans to plan future growth
- We offer the artisans feedback on their products and are actively involved in the design process to make sure they are aware of current and future market trends



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.





## REACH

We can confirm that the products supplied to you under the TriDri brand name conform to current REACH Regulations and do not contain any of the harmful substances controlled under its restricted substances list.

**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 (SVHCs) and are listed on the European Chemicals Agency (ECHA) website.

[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)

TriDri products comply with the EU general Product safety Directive 2001/95 EC. Also comply with the requirements of the Azo dye directive and Nickel directives meaning that no Dangerous substances and Preparations are used during the make up of any of its garments.

## The Azo Dye Directive EU Directive 2002-61-EC, and subsequent amendments

This directive covers those Azo dyes, which are degradable to carcinogenic aryl amines, and is applicable to Textiles and Leather used in finished articles or their dyed parts, which may come into direct and prolonged contact with the human skin or oral cavity. National Laws implementing the new directive restrict azo-colourants (dyes) in textiles and leather, replacing current restriction in Germany, Austria and the Netherlands. (The German and Austrian requirements for Azo-pigments will be retained, as they are not covered under this directive.)

## Garment production

When engaging in business TriDri always conduct a full factory audit and anyone working with them must adhere to a detailed code of conduct, which is integral to the business and that all suppliers and their sources must adhere to. The TriDri code of conduct is based on current best practices with regard to employment ethics, health and safety practices and environmental practices which include conforming to the Azo Dye Directive EU Directive 2002-61-EC; 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

- All dyes comply to EU regulations with regard to harmful dyes

## Labeling Summary

In order to ensure that all products within the European Union comply with the legislation, products are manufactured and labeled according to the following regulations:

**EU Textile Labeling Regulation** - The European Parliament and the Council of the European Union enacted the Textile Labelling Regulation on 27 September 2011, which became effective on 8 May 2012.

In accordance with all laws and ordinances, all Asquith & Fox garments are labelled and contain the following information:

- Model or item number of the product for unique identification
- Name and VAT number for identification of the manufacturer or importer
- Fibre composition of textile products according to Annex I of the Textile Labelling Regulation (**other materials must not be named**) in all the languages of the countries of the European Union, in which the textiles are to be sold (23 official languages, to make very sure)
- The weight proportions of all individual fibres must be shown as a percentage in descending order
- 10 EU countries also require Country of Origin in their prospective language

Regarding fitting of labels, the following is observed: Labelling and names of textile products must be durable, visible, easily readable and accessible; the label must be firmly attached.

## Testing

On TriDri garments the following performance testing could include any of the following standards:

Colour Fastness to Washing: BS EN ISO 105 C08: 2010

Colour Fastness to Water: BS EN ISO 105 E01: 2013

Colour Fastness to Rub: BS EN ISO 105 X12: 2002

Colour Fastness to Light: BS EN ISO 105 B02: 2013

Stability to Washing: BS EN ISO 6330: 2012

Formaldehyde (Free and Released) BS EN 14184 parts 1 and 2 2011 (not detectable for infant garments, 75ppm free, 300ppm released for others)

