

Code of Practice

Principle Standards

CODE OF PRACTICE

We, as a group of companies together with our associates, distribution channels, buyers, retail clients and/or partners (and their group companies or any associated companies (**we**) are committed to working in accordance with the UN Guiding Principles on Business and Human Rights.

Companies and businesses have the responsibility to respect human rights through policies and by working with robust standards and processes that will identify, prevent and manage the remediation of any human rights risks. We are committed to upholding these human rights standards and processes in our business operations and supply chain.

We have well established standards and processes that, when appropriate, are used to identify potential and actual human rights impacts. These are used to manage and prevent adverse impacts to persons and communities within, or related to, any part of our business operations.

We take a long term view of what is right and will remain committed to the continuous improvement of delivering high standards to meet the expectations of our customers, stakeholders and to protect the human rights of those engaged within, and supplying to, our business.

We support the principles contained within the Universal Declaration of Human Rights and the fundamental labour principles that protect workers' rights as defined in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work (ILO Core Conventions).

We expect our suppliers to understand, take responsibility for and ownership of for implementing the Code of Practice Principle Standards throughout their own supply chains and business operations. Compliance to the Code of Practice Principle Standards will be measured through the Code of Practice Auditing Standards set out in a separate document (Auditing Standards) and local law, which applies to all suppliers within our supply chain and business operations.

There are ten (10) Principle Standards:

- 1. No Forced Labour or Modern Slavery – Employment is freely chosen**
- 2. Freedom of Association and the Right to Collective Bargaining**
- 3. Safe and Healthy Working Conditions**
- 4. No Child Labour**

- 5. Fair Wages and Benefits**
- 6. Lawful Working Hours**
- 7. No Discrimination is Practiced**
- 8. Employment Security**
- 9. Respectful Treatment of Employees**
- 10. Management Systems**

To ensure our respect of human rights, we conduct reasonable due diligence to become aware of, prevent and address potential risks to human rights in our supply chains and operations. We report our work in a manner that is relevant and of value to provide continuous improvements.

1. No Forced Labour or Modern Slavery - Employment is Freely Chosen

There must be no form of modern slavery or forced labour, whether it be human trafficking, involuntary prison labour, indentured labour, bonded labour or otherwise. No employee should be obliged to work through force, financial pressure, intimidation or by any other means.

2. Freedom of Association and the Right to Collective Bargaining

The supplier and its factories must recognise and respect the right of the employee to join and organise associations of their own choosing and to bargain collectively. Where law restricts the right to freedom of association and collective bargaining, suppliers must not obstruct parallel means for free association and collective bargaining.

3. Safe and Healthy Working Conditions

Suppliers and their factories must provide their employees with a safe and healthy working environment and continue to work towards preventing work-related accidents and maintaining the welfare and safety of their employees.

4. No Child Labour

Suppliers must not employ children who are less than 15 years old or less than the legal minimum age in the country of manufacture. Where local law sets the minimum age at fourteen (14) years, under ILO convention 138 in accordance with developing country exceptions, the lower will apply.

5. Fair Wages and Benefits

Employees' wages should be enough to meet the basic needs of employees and provide for some discretionary expenditure. In all cases, wages must equal or exceed the minimum wage required by law or the industry benchmark standard, whichever is higher and include all legal benefit entitlements.

6. Lawful Working Hours

The normal working hours should not exceed 48 hours per week and must comply with national laws or the benchmark industry standards, whichever offers greater protection. Overtime working shall be voluntary, should not exceed twelve (12) hours per week and will not be demanded on a regular basis. Employees must be compensated for overtime 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.

7. No Discrimination is Practiced

All employees shall be afforded equality of treatment. We recognise and respect cultural differences, but will seek and identify suppliers who employ individuals based on their ability to do the job, irrespective of their gender, race, colour, language, nationality, ethnic or social origin, religious beliefs, political opinion, marital status, disability, property, age, sexual orientation or union membership. Health screening for the purposes of recruitment shall not be undertaken, unless otherwise required by law.

8. Employment Security

Wherever reasonably practicable, all workers should enjoy security and stability of employment and regularity of income. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided.

9. Respectful Treatment of Employees

Employees must be treated with respect, dignity and be employed in a workplace free of harassment, abuse, and degrading treatment. No employee will be subject to physical, sexual, mental or any other form of abuse or harassment or corporal punishment.

10. Management Systems

The Code of Practice Principle Standards must be underpinned by robust management systems to ensure compliance with local legislation and the Code of Practice Auditing Standards.

The Principle Standards are drawn from core ILO conventions and accompanying recommendations and are aligned to the ETI Base Code.

Implementation of and compliance to our Principle Standards is measured through our Auditing Standards and local law and is a condition of business for all our suppliers.

We will continue to work with suppliers who strive for continuous improvement. Where violations of the Auditing Standards are found and corrective actions are not implemented, business will be reviewed and ultimately, disengagement may ensue.