



RESPONSIBLE BUSINESS CONDUCT MR. RIEGILLIO

At MR. Riegillio, we believe it is important to purchase products and the materials they are made of, with respect for people, animals and the environment and to care for our entire supply chain. We aim for long-term relationships with our business partners, not only because this enables us to make the most beautiful products, but also out of concern for the people involved in the production process. We don't have factories of ourselves but cooperate with selected business partners. In cooperation we wish to develop sustainable products that are produced with minimal environmental impact and under good working conditions. Where necessary, we work on improvement. We consider it important to communicate clearly and unequivocally about our sustainability policy.

Our buyer discuss timely with suppliers what needs to be produced and in what timeframe. In doing so, we take into account the duration of production, purchase of materials, transport distance and method. We always discuss what's possible and try to find solutions if it doesn't fit. In this way we try to avoid excessive working hours. Suppliers can make use of subcontractors that have been approved by us in advance. Below you will find an overview of the criteria that form the basis for the care that we want to observe when working with our suppliers.

MR. Riegillio has a responsible purchasing policy based on social and environmental criteria for the supply chain based on international standards, conventions and guidelines. Working in compliance with all applicable laws and regulations on human rights, the environment and product safety is of great importance, but international standards are leading whenever they are more stringent.

We ask all our suppliers and subcontractors, from raw material to end product, to support us in our Responsible Business Conduct and to work according to the standards below. Only in cooperation can we achieve our goals of improving the social conditions under which production takes place, reducing our impact on the environment and improving lives.

Where, for any reason, compliance is not possible, please let us know so we can find a solution.

1. Our common responsibility – Due Diligence

Under the UNGPs¹ and OECD Guidelines², we bear a responsibility for preventing and reducing any adverse impact on people and the environment by their own operation or business relationships in the production or supply chain. This means acting in an ethical and transparent way that contributes to the health and welfare of society.

1. The UN Guiding Principles on Business and Human Rights are a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations. <http://www.ungpreporting.org/>

2. The OECD Guidelines for Multinational Enterprises are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognized standards. <http://www.oecd.org/corporate/mne/>



MR. Riegillio supports the Conventions of the International Labor Organization (ILO) and expects suppliers to act in accordance with the conventions of the ILO.

We have identified nine specific:

- Child labor;
- Forced labor;
- Discrimination and gender;
- Freedom of association;
- Living wage
- Safety and health in the workplace;
- Water pollution and use of chemicals, water and energy;
- Raw materials;
- Animal welfare.

Based on the ILO and OECD guidelines for the garment and footwear industry, we added,:

- No Sexual harassment and sexual and gender-based violence (SGBV) in the workplace
- Working hours
- Ethical trade, no bribery and corruption
- Grievance mechanism

We will do our Due Diligence and give particular attention to these themes and we expect this from our suppliers as well. This means that, with regard to these themes, suppliers will identify any possible adverse impact in the supply chain, set specific objectives and take measures which are suitable in the light of the insights resulting from their Due Diligence process.

We ask our suppliers to inform us about any possible risk regarding human rights violation, animal abuse and environmental hazards related to our products to cooperate to minimizing these risks. In order to identify these risks, we have created a questionnaire which you will find attached; we kindly ask you to fill this out and return it to us.



Our buying behavior:

We want to take our responsibility regarding sourcing and buying. It is very important to inform us when our buying behavior does not support the international social and environmental standards set below. We work according to the following buying strategy.

We will:

Forecasting:

particularly ask for long-term contracts to increase predictability and stability. This will also enable suppliers to plan for investments in machinery, equipment and human resources.

- work on a stable planning.
- share forecast and purchasing plan with our supplier and, if possible, book capacity.
- communicate changes in your forecast/purchasing plan on time.

Product development:

- provide clear technical specs and requirements.
- ask our supplier for feedback on new developments.
- review our sampling process with efficiency in mind.
- work with photo's/online video when possible or consider virtual prototyping.
- supply a target price for the product.

Price negotiation:

- get insight in price calculations and the production process.
- calculate in cooperation with our supplier how to get the best quality for the best price.
- consider material cost, labor, transport, testing, audits and the profit for the supplier.

Payment conditions:

- pay on time.
- pay what we agreed on.

Order placement, production, lead time

- We have a time & action plan with deadlines for all parties involved (buyer and supplier).
- We agree on realistic lead time.
- We make an agreement on late style/order changes .
- We work on understanding the local and cultural differences.



From our suppliers and subcontractors we expect:

Social compliance:

- to participate in a social compliance initiative.
MR. Riegillio is investigating to become a member of amfori BSCI, we prefer our suppliers to also participate in this initiative. However, we will also accept audits from other initiatives like SA8000, SMETA, FWF, WRAP and GOTS.

Production locations:

- to communicate where an order will be produced and which subcontractors will be involved.
Unless this information is shared with us, an order is NOT final.
- to discuss with us whenever moving production to another facility is intended, indicating the reason for this. This allows MR. Riegillio to adjust her purchasing process if this would lead to undesirable changes in production planning.

Negative impact:

- to advise whenever MR. Riegillio's buying procedure has a negative impact on the operation of suppliers and/or their workers and to discuss what is needed to remediate.



2. Social & Environmental Compliancy

The Responsible Business Conduct aims to attain compliance with certain standards. Supplier companies, in addition, must ensure that the responsible business conduct is also observed by subcontractors involved in production processes of final manufacturing stages. Within the scope of options for action and appropriate measures, supplier companies have to aim at the implementation and reporting of the following criteria in a development approach. MR. Riegillio declares that we will only work with subcontractors that are prequalified through the same rigorous processes to those used for direct contractors. Approved subcontracts may be reviewed on a semi-regular (e.g. annual) basis to remain approved. Workers of those subcontractors should have access to grievance mechanisms, similar to those of direct contractors. We will in no case work directly with subcontractors and only ask for transparency to know where our products are made and to be able to ask questions regarding social and environmental conditions.

2.1 Social Compliancy

Beneath you will find the most important ILO conventions related to human rights at the work floor.

Prohibition Child Labor and working conditions of young workers

ILO Conventions 10, 79, 138, 142 and 182 and Recommendation 146.

MR. Riegillio will not accept child labor under any circumstances. An employee must be at least 16 years old (or 14 years where national law permits). Suppliers and business associates must take measuresto ensure that they do not accept underage workers. If MR. Riegillio discovers that a child is working in a factory, unless factory management immediately terminates the child's employment and takes appropriate measures to make a positive change in the child's situation, this will be reason for terminating the business relationship.

There shall be no forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor. Young workers in the age of 15-18 shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety or morals. Children and young persons under 18 shall not be employed at night or in hazardous conditions.

*subcontractor = a person or firm being that is appointed by the main contractor, to carry out workor deliver services, labor or materials as part of a larger project.



Where young workers are employed, business partners should ensure that their work is not likely to be harmful to their health or development; their working hours do not prejudice their attendance at school, their participation in vocational orientation approved by the competent authority or their capacity to benefit from training or instruction programs.

Business partners shall set the necessary mechanisms to prevent, identify and mitigate harm to young workers; with special attention to the access young workers shall have to effective grievance mechanisms and to Occupational Health and Safety trainings schemes and programs.

Child Labor Due Diligence Bill

By signing this RBC approve that you will do anything you can to identify, prevent and if necessary address the issue of child labor in our supply chain.

We need to comply with the Dutch Law on Child labor Due Diligence on combating child labor in global supply chains, that is in force as of January 2020. Dutch companies and their supply chain business partners will have to declare that they have addressed the issue of child labor in their supply chains. This law requires companies to identify, prevent and if necessary address the issue of child labor in their supply chains. We ask our suppliers to cooperate and be transparent about subcontractors and sub suppliers and possible risks within the supply chain of our products so we can cooperate in combating child labor. Risk studies show that the severe risks are mainly at cotton farming and wet processing (like spinning mill) stage.

MR. Riegillio needs to be informed in high risk situations, for example when cotton comes from countries or facilities where forced labor is required and so the risks on child labor occurs. Ask your suppliers about their social management systems, latest audit reports or certifications like WRAP, SA 8000, Fair Trade, GOTS, Better Cotton or Organic Content Standard, or any other standard that entails child labor.

No Forced and Compulsory Labor and Disciplinary Measures

ILO Conventions 29 and 105.

There shall be no use of forced, including bonded or prison, labor. All forms of forced labor, such as lodging deposits or the retention of identity documents from personnel upon commencing employment, are forbidden as is prisoner labor that violates basic human rights.

Employees must be treated with respect and dignity. We do not accept work in which there is physical and/or mental punishment.

Employees must be free to leave the factory at any time and the freedom of movement of those living in residences run by the employer is not restricted.



No Discrimination

ILO Conventions 100, 111, 143, 158, 159, 169 and 183.

Employees should only be hired because of their suitability to perform the work in question and no discrimination shall be tolerated in hiring, remuneration, access to training, promotion, termination or retirement based on gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in workers' organizations including unions, political affiliation or opinions, sexual orientation, family responsibilities, marital status, or any other characteristic or circumstance.

Women and men shall receive equal pay for work of equal value, equal assessment of the quality of their work and equal opportunities to perform all jobs. Employers shall provide appropriate facilities and accommodation for female employees in connection with pregnancy, childbirth and breastfeeding.

No Sexual harassment and sexual and gender-based violence (SGBV) in the workplace

Our business partners are encouraged to adopt a zero-tolerance policy on sexual and gender-based violence and strict measures against sexual harassment in its own operations. The enterprise should articulate its expectations of suppliers and other business partners to likewise adopt a policy on sexual harassment and sexual and gender-based violence. Enterprises are encouraged to include the following in their internal policies

- a commitment to foster an environment at work free from harassment, bullying and violence
- clear consequences for breaking the enterprise's standards
- a commitment to hear grievances, to provide a "reprisal-free" complaints mechanism (e.g. operational-level-grievance mechanism) and to maintain the confidentiality of workers or employees who raise complaints

Freedom of Association and the Right to Collective Bargaining

ILO Conventions 11, 87, 98, 135 and 154

The right of all workers to form and join trade unions and bargain collectively shall be recognized. Employees must be free to join a trade union without the risk of threats, or punishment. The company shall, in those situations in which the right to freedom of association and collective bargaining are restricted under law, facilitate the development of alternative forms of independent and free association and bargaining for all workers. Workers' representatives shall not be the subject of discrimination and shall have access to all workplaces necessary to carry out their representation functions.



Payment of a living wages

ILO Conventions 26 and 131

Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and be sufficient to meet basic needs of workers and their families and to provide some discretionary income. Deductions from wages for disciplinary measures shall not be permitted nor shall any deductions from wages not provided for by national law be permitted. Deductions shall never constitute an amount that will lead the employee to receive less than the minimum wage.

Employees must be paid regularly and on time and shall be adequately and clearly informed about the specifications of their wages including wage rates and pay period.

Legally binding employment relations

Obligations to employees under labor or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labor-only contracting arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment. Younger workers shall be given the opportunity to participate in education and training programs.

Working Hours

ILO Conventions 1 and 14 and ILO Recommendation 116.

Working hours shall comply with applicable laws and industry standards. Employees may not be required to work more than 48 hours per week on a regular basis and shall be provided with at least one day off for every seven-day period. 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.

Safe and healthy working conditions ILO Convention 155

A safe and hygienic working environment shall be provided, and best occupational health and safety practice shall be promoted, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Appropriate attention shall be paid to occupational hazards specific to this branch of the industry and assure that a safe and hygienic work environment is provided for. If the risk of accidents and injuries is inherent to the work to be carried out, this risk will be minimized by providing regular health and safety training for the workers. Physical abuse, threats of physical abuse, unusual punishments or discipline, sexual and other harassment, and intimidation by the employer is strictly prohibited.

If accommodation is provided to workers, it must be clean, safe and meet their basic needs.



No Sandblasting:

MR. Riegillio does not accept the sandblasting process being used for our products, since this is affecting the health of workers.

Ethical trade: no Bribery and corruption

Enterprises should consider the good practices put forth in the OECD Good Practice Guidance on Internal Controls, Ethics and Compliance, which include:

- Strong, explicit and visible support and commitment from senior management to the company's internal controls, ethics and compliance programs or measures for preventing and detecting bribery, including the bribery of foreign public officials;
- A clearly articulated and visible corporate policy prohibiting bribery, including the bribery of foreign public officials; and
- Oversight of ethics and compliance programs or measures regarding bribery, including the bribery of foreign public officials, including the authority to report matters directly to independent monitoring bodies such as internal audit committees of boards of directors or of supervisory boards, is the duty of one or more senior corporate officers, with an adequate level of autonomy from management, resources and authority.

Grievance mechanism

MR. Riegillio needs a commitment to hear grievances from workers, to provide a "reprisal-free" complaints mechanism (e.g. operational-level-grievance mechanism) and to maintain the confidentiality of workers or employees who raise complaints.

MR. Riegillio plans to use the grievance mechanism of Amfori BSCI. In this online complaints mechanism on Amfori's website, both individuals and organizations can file a complaint if they feel that they have been harmed by the activities of Amfori. The Amfori secretariat will continuously review and improve the complaints mechanism where necessary.



2.2 Environmental Responsibility

MR. Riegillio wants to keep its ecological footprint as small as possible. We therefore want to be aware of the most important environmental impacts of our own activities and those carried out on our behalf, so that we can take appropriate measures to prevent any negative impact on society and the environment. We expect our suppliers and business relations to be aware of and comply with applicable local and national environmental laws and regulations. They must hold all mandatory environmental permits.

We ask suppliers to have procedures and standards for the use of water and energy, handling and disposal of chemicals and other dangerous materials, waste management, emissions and effluent treatment. The procedures and standards must meet the following international guidelines and legal requirements.

No hazardous Chemicals

No hazardous chemicals shall be used in processing stage and released in water or air. Employees shall be protected and equipped with the right safety measures and appropriate training. Chemicals shall be stored and labelled accurately.

Raw Material Policy

MR. Riegillio wants to lower the impact of her raw materials. E.g. Cotton is one of the most polluting fibers and very important for our collections, therefore we want to work with the better, low impact options.

- We ask our suppliers to keep records on the content and source of our raw materials and to reuse waste materials as much as possible.
- We expect our garment and textile suppliers to source for sustainable or preferred raw materials (indicated in the annex) and offer alternatives to conventional materials.
- It is important to measure, reduce and reuse material waste where possible.
- We ask our suppliers to offer available sustainable raw materials and to use/ask for one of the standards in the annex or a similar standards and to provide us with a copy of the scope and transaction certificates or other proof of compliance.

Endangered Species Policy

MR. Riegillio does not accept any raw materials from any endangered species as listed on the IUCN Red List, as critical endangered, near threatened, endangered, extinct in the wild, or vulnerable on the IUCN Red List⁴.

Therefore, suppliers must provide animal welfare guarantees when products of animal origin are used. MR. Riegillio does not accept real exotic animal skins (e.g. snake, alligator, crocodile, lizard, ostrich).

⁴ IUCN Red List: Union for Conservation of Nature's Red List of Threatened Species has evolved to become the world's most comprehensive information source on the global conservation status of animal, fungi and plant species.
<https://www.iucnr.org/redlist/>



Fur / Animal hair (e.g. Cashmere, Angora, Mohair)

MR. Riegillio does not accept animal fur or animal hair other than wool.

Leather

Real leather and suede from sheep, pigs, goats and cattle reared for meat production & synthetic leather are accepted. All other leather variations are NOT permitted!

Down Feathers Policy

MR. Riegillio does not accept down/feathers from live-plucked birds and from force fed birds.

MR. Riegillio only accepts down/feathers from meat production and prefers down/feathers that are certified to the Textile Exchange Responsible Down Standard.

Packaging

Since plastic is non-biodegradable, recycling it is a part of global efforts to reduce plastic in the wastestream, especially the approximately eight million metric tons of waste plastic that enter the earth's ocean every year. Soft plastics are also recycled during the manufacturing process

of plastic goods such as polyethylene film and bags.

- We ask our supplier to actively research and offer options that are a better choice for the environment: reusable, recycled and/or reduction of packing materials.

Plastic

- We ask our suppliers to use preferred plastics for our products and packaging like PVC free, recycled (PET) plastics and biodegradable plastics (see GRS certification) of e.g. PLA (corn sugars).

Cardboard

- We ask our suppliers to use recycled or FSC/PEFC certified cardboard. We aim to only use cardboard and paper packaging which consists of 100% recycled paper fiber.

Waste reduction

- We ask our suppliers to reduce (raw) material waste as much as possible and preferably join a recycling program (packaging waste, material cutting waste etc.)



By signing this RBC statement, you commit yourself to it. The undersigned hereby confirms that:

We have read the Responsible Business Conduct (RBC) and accept the terms required of us as suppliers and will inform and cooperate with our subcontractors and sub suppliers working on products of MR. Riegillio. We will inform MR. Riegillio and discuss non-compliances and the issues involved in their product's supply chain.

For MR. Riegillio

Riegillio de Wagt

For Supplier / Subcontractor:

Date:

Name:

Position:

Signature: