



# Supplier Code of Conduct Social and Environmental Compliance

## INTRODUCTION - Supplier Codes of Conduct

At Tiny Explorer Apparel Limited 'The Company' we take our social and environmental responsibility seriously and expect our suppliers to do the same.

These Codes of Conduct are based on the [Universal Declaration of Human Rights](#), the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#), the [Rio Declaration on Environment and Development](#), and the [United Nations Convention Against Corruption](#).

'The supplier' is subject to our Codes of Conduct, which serves to supplement international, national, local and other relevant laws. Should there be any differences in standard between these Codes of Conduct and relevant laws, [the supplier] will be expected to withhold the highest standard. In the spirit of continuous improvement, suppliers will be assessed for compliance to these international standards with findings and remedial actions tracked and subject to follow up assessments.

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## Ethical code of conduct

[The supplier], its employees and others acting on its behalf will follow the law, its licensing/authorisation obligations and any other regulations. [The supplier] will;

- Not tolerate bribery of any kind
- Not offer or accept gifts, payments or hospitality to encourage or reward a decision
- Comply with the applicable national and/or international accounting and banking standards and processes, as well as law with respect to money laundering, financing of terrorism, fraud, and other illegal activities.

## Anti-Corruption and Bribery

[The supplier] abides by all applicable anti-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act (FCPA) in the USA and applicable international anti-corruption conventions. [The supplier];

- Has a zero tolerance to bribery and corruption in all business transactions, as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business
- Will not allow any employee to suffer negative consequences for voicing a concern or refusing to engage in an act of bribery
- Will not condone payments, gifts in kind, expenses, discounts, advantages or promises that may influence the course of business decisions
- Will have appropriate systems in place to manage bribery risk
- Will train its employees in anti-corruption practices.

## Gifts and hospitality

Gifts and hospitality are often an appropriate part of a working relationship but [the supplier] employees must not offer or receive gifts and hospitality that might improperly influence a business decision or create a feeling of obligation.

[The supplier] will provide appropriate guidance to all employees on what is not acceptable;

- To give or receive a gift or hospitality intended to influence either party
- To give or receive lavish or extravagant gifts or hospitality which is, or may be seen to be, inappropriate in the circumstances
- To give or receive gifts or hospitality if either party is involved in on-going commercial negotiations or could influence the decision
- To break any laws or regulations in either your country or the other country
- To give or receive a gift of cash or shares

## Data Protection and Privacy

All employees must comply with applicable local privacy and data protection laws and regulations and respect the privacy of [the supplier]'s customers, contractors, suppliers and employees and seek to protect their personal data.

Everyone processing personal data should be aware of the data protection principles, which must be complied with. These are:

- Processed fairly and lawfully. There must be a lawful basis for obtaining, holding and sharing the data and the data must only be processed in a way that the individual would reasonably expect.
- Obtained for specified and lawful purposes. Data must only be obtained for specified purposes and can only be disclosed if the disclosure is compatible with those purposes.
- Adequate, relevant and not excessive. Only information that continues to be relevant should be kept. When making disclosure only information relevant and necessary for the purpose for which it is being disclosed should be shared.
- Accurate and up to date. Information should be accurate and up to date. (In relation to civil registration, records are required to reflect the facts at the time of the event and may only be corrected where an error has occurred via the processes set out in law).
- Not kept any longer than necessary. Information should only be kept for as long as necessary and deleted once it is no longer required for the purposes for which it was collected.
- Processed in accordance with the individual's rights. Individuals have the right to have factually incorrect information corrected. In addition, this principle also allows individuals to have access to personal information held about them – e.g. Subject Access Requests.
- Securely kept. Organisations holding personal information are required to have adequate security measures in place to ensure appropriate processing of personal data and to ensure personal data is not lost or stolen.
- Not transferred to any other country without adequate protection in place. Personal information must not be sent to a country or territory unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

## Human Rights code of conduct

[The supplier] is committed to respecting human rights throughout its supply chain. We believe that everyone should be treated with respect and work in a safe environment. The Code is based on the Ethical Trading Initiative (ETI) Base Code which stems from international labour and human rights law.

[The supplier] will uphold the United Nations Universal Declaration of Human Rights, by;

- Respecting fundamental Human Rights, as according to the United Nations Guiding Principles on Business and Human Rights
- Recognising and respecting the rights of indigenous peoples and the value of their traditional, cultural and social heritage and expecting its suppliers to comply with this requirement
- If operating in, or sourcing directly from a conflict-affected area, performing human rights due diligence to assess the heightened risks of adverse human rights impacts
- Training appropriate employees in human rights issues.

## Workforce code of conduct

[The supplier] will uphold the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, including in its supply chain, by ensuring that;

## Employment is freely chosen

[The supplier] has a zero-tolerance approach to modern slavery. [The supplier] accepts its responsibility to implement sufficient systems and controls to safeguard against any form of modern slavery and to protect the rights of workers and recognize this is an ongoing journey. To ensure;

- There is no forced, bonded or involuntary prison labour
- Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice
- Grievance and whistleblowing measures are provided and communicated to allow employees to report actual or suspected misconduct without fear of reprisal.

## Freedom of association and the right to collective bargaining are respected

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively

- [The supplier] has an open attitude towards the activities of trade unions and their organisational activities
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace
- 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.

## Working conditions are safe and hygienic

A safe, secure and hygienic working environment will be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps will 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, and;

- Workers will receive regular and recorded health and safety training, and such training will be repeated for new or reassigned workers
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage will be provided
- Accommodation, where provided, will be clean, safe, and meet the basic needs of the workers
- Responsibility for health, safety and security is assigned to a representative of senior management.

## Child labour will not be used

If [the supplier] discovers any child labour employed in its supply chain, it will take immediate action to put a stop to it, with the child's best interests in mind

- Young persons under 18 will not be employed at night or in hazardous conditions.

## Living wages are paid

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher.

- All workers will 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
- Deductions from wages as a disciplinary measure will not be permitted nor will 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.

## Working hours are not excessive

Working hours must comply with national laws, collective agreements, and the provisions below, whichever affords the greater protection for workers.

- Working hours, excluding overtime, will be defined by contract, and will not exceed 48 hours per week.<sup>1</sup>
- All overtime will be voluntary. Overtime will be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It will not be used to replace regular employment. Overtime will always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- The total hours worked in any seven day period will not exceed 60 hours, except in exceptional circumstances where all of the following are met;
  - this is allowed by national law
  - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce
  - appropriate safeguards are taken to protect the workers' health and safety, and
  - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- Workers will be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

## No discrimination is practised

[The supplier] will ensure that 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.

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<sup>1</sup> International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

## Regular employment is provided

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

- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship will not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor will any such obligations be avoided through the excessive use of fixed-term contracts of employment
- Home-working arrangements will comply with the ILO Home Work Convention, 1996 (No. 177)

## No harsh or inhumane treatment is allowed

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

## Environmental code of conduct

[The supplier] is committed to protecting the environment throughout its operations. [The supplier] expects its employees, along with those engaged in conducting business with, or on behalf of, [the supplier] to comply with this Code of Conduct.

In conducting business, [the supplier] will demonstrate its commitment to environmental stewardship through the application of the following general principles;

- Act in accordance with the best principles for the mitigation of environmental harm and the enhancement of environmental quality
- Comply with or exceed applicable environmental laws and regulations
- Develop, maintain and follow policies and procedures that provide a framework for environmental protection, accountability and stewardship
- Monitor its activities to confirm compliance with regulatory, corporate and industry standards and to identify and correct potentially adverse effects on the environment
- Prevent pollution and reduce consumption of resources through waste management strategies that promote waste minimisation re-use, recovery and recycling, as appropriate
- Strive to ensure that the uses of natural resources are fair and sustainable, taking account of the needs of a diverse society
- Seek to conserve resources through the safe, efficient and responsible management of materials and wastes, reducing, reusing and recycling wherever appropriate
- Minimise and mitigate the adverse environmental effects of products through environmentally-responsible design
- Incorporation of energy efficiency measures into the company's facilities and promoting efficient energy use in all areas of business activity
- Adopt a procurement programme which takes into account the environmental impact of products and services and supports the purchase of eco-efficient products and raw materials
- Ensure staff are aware of the environmental impacts of their work activities and encourage them through regular awareness and training to minimise those impacts



- Promote the protection and enhancement of biodiversity and ecosystems through employee awareness programs and stakeholder engagement
- Strive to improve environmental performance, accommodate evolving standards and integrate, where appropriate, the results of scientific investigation and technological innovation to enhance environmental protection.

## Sourcing code of conduct

Recognising that sustainable businesses should acknowledge the planet's finite resources, [the supplier] expects its suppliers to support sound environmental management principles and reduce their impact on the environment within which they operate. In addition, [the supplier's] suppliers are expected to;

- Have a written environmental/sustainability policy appropriate to the size and nature of [the supplier's] operations that, where applicable, addresses preventing, mitigating and controlling serious environmental and health impacts from operations including raw material usage, greenhouse gas emissions, water, waste, air quality and biodiversity
- Have an effective internal environmental management programme/system with adequately trained staff
- Abide by all legislation and regulations related to the protection of the environment and the handling of dangerous and hazardous materials
- Validate that all input materials and components were obtained from sustainable sources consistent with international treaties and protocols (including, for example; the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the Kimberley Process Certification Scheme (KPCS) and the World Diamond Council voluntary system of warranties) in addition to local laws and regulations.
- Disclose the material characteristics and health and safety information of the products that they supply to [the company] in compliance with the relevant trading standards legislation, and where they exist, specific national or international regulations and generally accepted industry guidelines
- Commit to using responsibly sourced paper, packaging and other timber-based products.
- [The supplier] will be capable of disclosing all certifications and the potential sources of countries of origin associated with raw materials used.

Suppliers involved in the perfumes and cosmetics industry will;

- Ensure that the fragrance compounds, formulae, packaging components or finished products they supply are safe for their intended use and comply with all applicable laws worldwide to the best of their knowledge
- Ensure perfumes, cosmetic products or ingredients have not been tested on animals for a perfume or cosmetic use.

[The supplier] must demonstrate that they are taking steps to assure that the minerals (3TGs), gold and/or platinum group metals within the supply chain meet international standards for responsible business practices and are conflict-free.

For the food and drinks industry, [the supplier] must ensure that it complies with the appropriate food standards, laws and regulations. For example: the European Commission Standing Committee on the Food Chain and Animal Health.

## Animal Welfare

[The supplier] must respect animal welfare and work progressively towards adopting healthy and humane practices towards animals based on best available technology and standards.

- All suppliers must adopt healthy and humane practices that respect animal welfare and are based on best practice (for example; the Sustainable Luxury Working Group Animal Sourcing Principles)
- Upon request, suppliers must provide documentation and/or allow audits of their supply chain regarding animal welfare due diligence.

# Supplier's Acknowledgement

We, [the supplier] confirm that:

- We have received and taken due note of the contents of the Codes of Conduct
- We are aware of all relevant laws and regulations of the countries in which we operate
- We will report to [the Company] any case of violations of the Codes of Conduct.
- We will comply with the Codes of Conduct without amendment or abrogation.
- We will inform all of our employees/ subcontractors of the content of the Codes of Conduct, and that we will ensure that they comply with the provisions incorporated therein.

We hereby authorise [the company] or any organizations acting on behalf of [the Company] to carry out audits with or without notice at our premises and the business premises of our subcontractors at any time to verify compliance with these Codes of Conduct.

Name of Supplier \_\_\_\_\_

Name \_\_\_\_\_

Title \_\_\_\_\_

Signature Company Stamp/Seal \_\_\_\_\_

Company's Business Registration/Statutory ID/Code/Number  
\_\_\_\_\_

Date & Place \_\_\_\_\_

This document must be signed by an authorized representative of [the Supplier] and returned to Tiny Explorer Apparel Limited.