

BAUKJEN Isabella Oliver

Corporate and Social Responsibility.

Introduction.

This document is designed to assist all factories involved in the production of Isabella Oliver/Baukjen product to protect the integrity and reputation of the Isabella Oliver brand and ensure compliance with Isabella Oliver's ethical trade and Intellectual property policies.

This document is intended as guideline only.

Country laws and regulations underpin this policy and factories must comply with the relevant local laws and regulations, you should obtain legal advice and help as appropriate.

Isabella Oliver believes that by working together with all factories we can strengthen our business and improve the quality of life of the people who Isabella Oliver impacts. The policy exists for the purposes of promoting safe and fair working conditions and responsible management of environmental and social issues in the IO supply chain.

Note that all references to 'Factories' include the following:-

- Finished Goods Vendors
- Raw materials suppliers
- Production Sites.

Isabella Oliver's policy is based on that of the Ethical Trading Inactive Base Code which reflects the most relevant international standard of labour practices. The Ethical trading aspect is to ensure that the working conditions of workers meet, but preferably exceed international labour standards

Please ensure that the factories:-

- Display Isabella Oliver's policy within the factory.
- Be open and honest with any Isabella Oliver Staff or Third Party auditors about issues the factory may have.
- Check that all sub-contractors comply with this policy.

Employment is chosen freely.

- There should be no forced, bonded or involuntary prison labour.
- Workers are not required to lodge 'deposits' or identification papers with their employer and are free to leave their employer after reasonable notice.

How to:

1. Ensure that the workplace policies and their implementation allow all workers to leave employment (after reasonable notice period) without losing pay or benefits that they are entitled to.
2. Workers must have a free choice, in advance to work overtime by:-

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- a) Allowing workers to leave the factory premises once their shift has finished.
 - b) Ensuring that overtime is voluntary and where possible allowing workers to agree to overtime in advance
 - c) Have workers sign for their voluntary participation in overtime work
 - d) Should transport be provided to and from the factory ensure that this is available for those employees who wish to leave on time as well as those working overtime
3. Factories should not require depositions or similar monies from workers for any work related materials, or any other reason.
 4. No originals of worker ID cards or Passports should be kept on site by management or agents (copies of documents are permitted)
 5. No loans offered to workers should tie the workers into employment
 6. Take care that all employees, when contracted are entering the contract voluntarily and are aware of their rights

Freedom of Association and the right to collective bargaining are respected.

- Workers have the right to join or form trade unions of their own choice and bargain collectively.
- The employer should adopt an open attitude towards the trade union activities.
- Worker representatives must not be discriminated against and should have access to carry out their representative duties at work.
- Where the right to freedom of association and collective bargaining is restricted by local law the employer should facilitate and not hinder the development of parallel means for independent and free association and bargaining.

How to:

1. Worker representatives should be allowed to carry out their duties without losing pay
2. Encourage workers to form an Elected Committee if workers choose not to form a union.
3. If trade unions and collective bargaining is illegal in the country of manufacture then please allow alternative collective negotiations to take place.
4. Engage in negotiations and respond to concerns and ensure that any remediation is communicated to workers.
5. Check that minutes of each workers committee meeting are taken and displayed for all workers
6. Check that workers are able to use collective bargaining without fear of punishment
7. Worker representatives should be elected by the workforce and that Union representatives should not hold management positions, Union members should include majority of in line workers.
8. Do not threaten, penalise, restrict or interfere with workers efforts to organise or join an association
9. Provide workers with the necessary information to form or join a union and give them every opportunity to do so.

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Working Conditions are Safe and Hygienic.

- Workers should receive regular and recorded health and safety training and such training shall be repeated for new or re-assigned workers.
- Access to clean toilet facilities and drinking water and appropriate facilities for food storage should be provided.
- There should be a senior member of management staff responsible for health and safety.
- A safe and hygienic working environment should be provided; steps should be taken to prevent accidents and injury to health.

How to:

1. Health and Safety training should be given to key workers, this training should be provided by the company and within company hours, no pay should be lost through training.
2. There should be separate toilet facilities for men and women at approximately 1 toilet per 35 people, toilets should be cleaned and maintained regularly.
3. Health and safety policies should be communicated to all staff.
4. Factory should display health and safety posters displaying local law and this should be communicated to all staff.

Child Labour.

- There must be **NO** child labour.
- Staff under the age of 18 must not be employed in hazardous conditions, and not at night.

How to:

1. The factory is responsible for checking that no children under the age of 16 are employed, if the national law within a specific country specifies a higher age, then this higher age must be adhered to.
2. The factory should keep copies of ID (identification) and proof of age for each worker, factories should inspect the original and not accept photocopies or obvious fakes.

Young Workers (Between 16 and 18).

- Keep a list of all young workers
- Working hours must not exceed local law.
- Young workers should not perform the following tasks (including, but not limited to) use of chemicals, dust, machines, tools or night work.
- Young workers should have access to education and should not be discouraged from additional education opportunities
- If workers are employed under an apprentice status then the factory should abide by the national rules governing apprenticeships
- No young workers should work overtime; this includes weekends and paid national holidays
- The factory must comply with all laws regarding young workers' wages and benefits.

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Living Wages.

- All wages and benefits paid for a standard working week must meet a minimum of the following – National legal standards or industry benchmark standards, whichever is higher.
- Wages should always be enough to meet basic needs and provide discretionary income.
- Factory must supply written information regarding their employment conditions and wages before commencing employment.
- Staff must be informed in writing of the pay period – how and when they will be paid and any deductions that may be taken.
- Deductions from wages for disciplinary means is not permitted, nor any deductions (except those required by national law) should be taken without written permission of the employee
- Any disciplinary measures should be recorded.

How to:

1. Factory should keep wage records of all staff.
2. Wages must be paid regularly (preferably monthly) by cash, cheque or bank transfer directly to staff.
3. Monies must not be held as a deposit from workers.
4. Deductions (except those required by national law) must not be taken without written permission by the worker, any deductions made must be fair and clearly communicated in writing to staff by employment contracts and pay slips.
5. Fines and deductions are not allowed as a disciplinary measure.
6. Factory should be aware of all local and national laws regarding minimum pay and overtime payments.
7. Factory should be aware of industry legislation regarding seniority and wages according to position.
8. All workers should receive the correct benefits and be covered by the correct insurance polices set out by national law.
9. Workers should understand how their wages and any overtime bonus is calculated.
10. Workers, when paid should be given a pay slip showing how their wages have been calculated; this should be in their native language.
11. Piece work is not recommended, all workers should meet the required legal minimum wage regardless whether factory quotas are met.
12. Check that correct pay is calculated for any overtime (overtime deemed as any hours worked over the normal working hours a week as legislated by local law)
13. Any trainees and apprentices should be paid their legal minimum wage and all paperwork related to this should be kept on file.
14. Workers should not be constantly kept on a training contract in order to reduce wages.
15. Moving workers between factories to avoid paying overtime is not permitted.
16. Copies of working hours and pay must be kept on file at the factory
17. Contracts for workers must be supplied in their native or local language.

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Worker Facilities.

- Must be cleaned and maintained.
- Should be well lit and ventilated
- Segregated Male and Female facilities
- Provide the correct amount of toilets/washing facilities for the number of workers and ensure that access is unrestricted at all times of the day.

Canteen and Food Preparation/Storage

- Factory to maintain crockery and cutlery washing equipment
- Provide staff with overalls/hairnets/ gloves etc.
- Check all equipment is safe, maintained and cleaned.
- Areas for eating and rest are specifically used and designed for such.
- If refrigerators are used then these should be arranged so that cross contamination of food is prevented.
- Ensure that staff are properly trained in food handling and that any government health inspections are kept up to date.
- Take measures to eliminate dust and prevent presence of insects and rodents
- Drinking water should be made available to workers with unrestricted access in the canteen as well as the workplace.
- Provide enough specific seating for all workers in the eating area.

Excessive Working Hours.

- Working hours should comply with national laws or industry standards whichever affords the greatest protection.
- Workers shall not, on a regular basis be required to work more than 48 hours per week or 11 hours on any day and must be provided with 24 consecutive hours off for every seven day working period.
- Overtime must be voluntary and not exceed 12 hours per working week and must not be demanded on a regular basis and must always be compensated by a premium overtime rate.

How to:

1. Do be aware of the national and international laws regarding working hours
2. Factory must keep accurate records of working hours
3. Records must be broken down into standard and overtime hours worked and should be kept for a minimum of 12 months (or longer should national law require)
4. Factory should allow regular and reasonable breaks (a minimum of 15 minutes every 4 hours)
5. Factory must strictly enforce all national laws concerning pregnant women.
6. Overtime should be exceptional rather than a regular occurrence.
7. Workers should have at least one day off a week
8. Workers should not work over 48 hours per week or 12 hours overtime, working hours must not be excessive or above legal limits.
9. Overtime should be paid at a premium limit in line with national laws and should be clearly communicated on pay slips and separated from regular working hours.

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10. The factory must ensure that all overtime worked is agreed voluntarily by the worker. Workers have the right to refuse overtime in advance; it is not acceptable for workers to sign any documents agreeing to work overtime on demand.
11. Holiday entitlements must be documented and clearly communicated to all workers; all workers must receive their entitled annual leave, maternity leave or sick leave etc.
12. Copies of working hours and pay documents should be kept on the factory site.

Discrimination.

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

How to:

1. Do not advertise any discriminatory job descriptions based on colour, gender, marital status, religion/creed, race, nationality or age
2. Factory should have a documented grievance policy which covers regarding discrimination can be dealt with.
3. Pregnant women should be allowed to return to work after giving birth if they so choose.
4. Pregnancy testing and questions relating to pregnancy must not be part of the recruitment procedure. Pregnancy tests should only be used should national law require or if it is to comply with local laws regarding heavy lifting or use of chemicals.
5. Factory should comply with all laws regarding discrimination within the workplace
6. Men and women should receive equal pay for equal work.

Regular Employment is provided.

- Work performed must be on the basis of an employment relationship established through national law.
- Regular employment must not be avoided through the use of excessive fixed – term contracts, labour only contracting, sub-contracting or home working arrangements or through training and apprenticeship schemes where there is no intent to impart skills or provide regular employment.

How to:

1. Workers contracts must be provided in a local language.
2. Documentation showing the worker is legally permitted to work must be kept on site.
3. All workers should be provided with the remuneration and severance pay that they are entitled to.
4. Workers are not to be kept on temporary contracts – workers should have no more than two 6 month contracts (less if stated by national law).
5. The status of apprentice should not be abused, All apprentices should receive relevant training and a permanent position should be offered once the apprenticeship has been completed.

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6. The factory should adhere to the maximum number of apprentices allowed by national law and should not exceed this.
7. All workers must have a contract of employment which includes terms of employment, working hours and pay (including standard and overtime).
8. When workers are dismissed they must be given the correct period of notice.
9. All workers, whether permanent, temporary or contractors should have the social security benefits that they are legally entitled to.

No Harsh or Inhumane treatment is allowed.

- Physical, verbal and sexual abuse or discipline or the threat of abuse, harassment or other forms of intimidation are prohibited.
- Factories will have a formal grievance disciplinary procedure with documented records of individual disciplinary hearings. This procedure will support fair treatment of staff.

How to:

1. Understand the official disciplinary procedures to be followed by law and understand the disciplinary measures that are not permitted and why.
2. A formal and documented grievance procedure which is written and recorded must be in place.
3. Disciplinary measures must be communicated to all workers. Records should be kept of all disciplinary or grievance issues raised.
4. No workers are allowed to suffer or be threatened with physical, sexual or verbal abuse and harassment, nor bullying and intimidation.
5. All workers should understand how the grievance procedure works and should be encouraged to use it.
6. Dismissal should only be used on the grounds allowed by law and must be officially documented.

Searches.

- Best practice avoids searches by having CCTV or a management system in place for controlling products going in and out of the building. Where it is necessary to carry out searches:-
- The searches must be communicated to workers in their contract and made clear before joining.
- Searches must be applied fairly and without discrimination.
- Should be conducted sensitively in a private area respecting male/male, female/female.
- All those conducting searches should be trained in human rights issues
- Workers must not be penalised for time spent queuing.

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Entitlement to Work and Migration.

- Factories should only employ workers with a legal right to work in the country.
- The factory is responsible for validating this by reviewing original documentation (then returning to the workers – copies should be taken and kept as per the countries data protection act)
- If employment agencies are used, they can only supply workers that are registered with them.

How to:

1. Monitor any employment agencies used to ensure that they work to the above standards.
2. Keep documents for agencies used documenting contacts and invoices.
3. Any workers supplied by an employment agency must have a legal contract with the agency.
4. Ensure that agency workers comply with the standards under the heading 'Forced Labour'
5. Check the workers legal right to work by checking and validating the original documentation (copies may be taken but original documents must be returned to the worker).
6. Copies of all staff information must be kept.
7. Only staff that have a legal right to work must be employed.
8. Do be aware of immigration rules and regulations.
9. Keep a list of any migrant workers with all relevant documentation.
10. Migrant workers are not required to lodge identity papers as a condition of employment.
11. If safekeeping of the documents is offered to workers it must be documented and signed by both parties.
12. Workers must be allowed immediate access to their documents on request, and have them returned at their request with no conditions imposed.
13. Workers must fully understand their employment contacts before leaving their home country.

Sub Contracting and Home Working.

- Factories who sub contact must inform the Production Manager and Senior Garment Technologist of their intent.
- Sub-contractors are not allowed to sub contract further without permission of Isabella Oliver.
- Factories that use home workers must inform the Production Manager and Senior Garment Technologist and should manage the home workers correctly in accordance to this manual.

How to:

1. No subcontracting is permitted unless Isabella Oliver has been notified and approved this in writing.
2. Do not use home workers unless Isabella Oliver has been notified and approved this in writing.

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3. Records and systems which manage Sub contractors and Home Workers which clearly show which part of the manufacturing process is being carried and when, where and by whom.

Health and Safety.

- Relevant national and international laws and standards for health and safety must be adhered to.
- Standards should be regularly revised to ensure that any updates and changes to national and international law are met.

Health and Safety Committee.

- To ensure that procedures are reviewed frequently and issues are dealt with quickly and efficiently.

Health and Safety Policy.

- This should be communicated to all workers and be written in both English and local languages ensuring that all workers understand.
- This policy should include statutory regulations and codes of practice relation to Health and Safety.

1. Management should ensure that they provide the best health care for their workers, this includes:-
2. Trained first aiders, who have qualified on a recognised training course. The factory should provide one first aider per 50 workers (if less than 50 workers there must be at least one trained first aider).
3. First aiders must be identifiable by notices posted around the factory, or by a special badge worn by the worker.
4. First Aid boxes must be visible with clear signage so that they can be seen from anywhere in the factory.
5. The First Aid box should be easy to reach and unobstructed.
6. Emergency contact numbers should be posted in large print – Hospital, Police, Fire Department etc.
7. If legally required within local law, employ a full time doctor or nurse.
8. An accident log book must be used and kept up to date.
9. Keep records of any treatment being given, regardless if this is related to work or not.
10. If national law stipulates that young workers require a regular health examination, the factory must meet these costs.
11. Display copies of the first aid certificates.
12. Be aware of any national laws which need additional requirements.

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First Aid.

- A first aid box must be provided for every 100 workers, if the factory is spread out over more than one than one floor of building then there must be one box per floor or building.
- Allocate an responsible first aider for the use and content of the kit, there must be at least one trained first aider per first aid kit/per shift.
- First aid boxes must be clearly indicated with the correct signage.
- The first aid box must be checked regularly to ensure that the contents has not expired. The box must be checked and re-stocked if needed.
- All first aid boxed must be unlocked during working hours.
- Where chemicals are used a foot operated eye wash station should be provided.

The basic contents of a first aid box should be as follows:-

Product	<u>10 Pers</u>	<u>20 Pers</u>	<u>50 Pers</u>
Emergency booklet	1	1	1
Assorted waterproof plasters 10pk	2	4	6
Eye pad	2	4	6
Triangular bandage	4	6	8
Safety pins 6pk	1	2	2
Medium dressing 12 x 12cm	6	9	12
Large dressing 18 x 18cm	2	3	4
Antiseptic Cleansing wipes	10	10	20
Pairs of nitrile powder free gloves	1	2	3
Eye Wash	1	2	3
Burns Treatment	1	2	3
Resusitation Masks	1	2	3
Cold Packs	1	2	3
Antiseptic Spray	1	2	2
Tweezers	1	1	1

- If local law stipulates the use of the first aid room then this must be provided, if not this is considered best practice and is recommended.
- If any event first aiders should have access to an area in which to treat workers, this dedicated area should conform to the below standards.
- The area should be covered in an easily cleaned surface and should be cleaned regularly.
- It should be available during all working hours.
- Should offer patient privacy
- Should be well lit with good ventilation.
- The area should be clearly identified with signs

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Fire Safety.

The three main priorities must be addressed.

- Reducing the risk of fire
- Having an effective emergency evacuation plan
- Having adequate fire fighting equipment readily available for use.

In order to implement the above three point management should nominate staff which are authorised and trained to use the fire fighting equipment.

There are four classifications of fire.

Class A

Wood, Paper, Cloth, Rubber and Plastic.

Class B

Flammable liquids – Gasoline, Oil, grease, Acetone

Class C

Energised electrical equipment including motors, transformers and wire.

Class D

Metals such as potassium, sodium, aluminium, magnesium

There are different types of fire extinguishers which are applicable for factory use.

Water (APW)/Water Mist

For use on CLASS A fires only.

Carbon Dioxide (CO2)

For use on CLASS B & C fires.

May be ineffective at extinguishing a class A fire

Dry Chemical (Type BC & ABC)

Deigned to fight A/B/C fires, but can be corrosive to metals such as aluminium so not recommended for use on electronics. ABC extinguishers are more corrosive than BC extinguishers

Metal/Sand Extinguisher.

Used to fight a CLASS D fire, but these are not usually common in apparel factories.

Fire drills should be conducted twice a year or more frequently if there is a high turnover of staff.

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Fire Extinguishers and Hoses.

- Adequate numbers of fire extinguishers should be provided based on the size of the factory and where there are multiple floors fire extinguishers should be positioned in the same location on each floor.
- The correct extinguishers should be available accordingly to the fire risk.
- Fire extinguishers should be checked regularly and should be accompanied by an inspection record.
- All extinguishers should be clearly visible and marked and should be fixed to a wall or stand.
- The top of the handle should be no more than 1 meter from the floor.
- The contents of the extinguisher should be clearly marked in the local language
- Instructions should be clearly displayed and only trained personnel should use the extinguishers.
- Adequate numbers of fire hoses should be provided based on the size of the factory and where there are multiple floors fire hoses should be positioned in the same location on each floor.
- All fire hoses should be clearly visible and marked.
- Fire hoses should be checked at least once a year and should be accompanied by an inspection record.
- Instructions should be clearly displayed and only trained personnel should use the fire hoses.
- **DO NOT** lock away fire extinguishers and hoses.

Fire Evacuation.

- A designated safe assembly point should be clearly identified and communicated to the workers.
- Fire alarms should be tested frequently and fire drills should be conducted at least every six months.
- Signs should be visible for all escape routes.
- Develop evacuation plans including location of fire fighting equipment, alarm points, emergency exits, emergency routes and safe assembly points with appropriate plans for disabled and pregnant employees – this must be reviewed at least annually.
- There should be at least two different fire exits per floor allowing for two separate escape routes
- Escape routes and exits should be kept unlocked during working hours and should be kept clear for a safe exit and free from combustible materials.
- Ensure that it is possible to escape from the outside of the building, if the building is fenced then there must be a clear way out of the fenced areas.
- Alarms must be able to be heard in all parts of the building, including the noisy areas.
- The alarm system must be able to work even in the event of a power failure and that the alarm is wired in fire resistant cabling.
- Aisles should be a minimum of 82cm wide to allow for evacuation.
- All doors used by more than 50 people should open in an outwards direction of escape and should not be locked or need to be opened with a key.
- The alarm should be tested weekly.

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- Factory should have an evacuation plan/map showing “you are here” and exits clearly indicated.
- Fire evacuation lighting should be throughout the entire escape route and also in room without windows; it should have a minimum lit duration of one hour (unless required longer by local law)
- Evacuation lighting should be in a high position for clear visibility
- Emergency exits should be located in a clear space on the wall and not obstructed from view.
- Check emergency exit signs regularly.
- Test battery operated signs regularly.

Electrical Safety.

- Care and special precautions must be taken when electricity is used.
- Damage to electrical equipment and wires must be fixed as soon as possible and the equipment not used until the damage has been rectified.
- Overloading the electrical equipment may cause the equipment to become hot which can create fire hazard.
- Electrical equipment must be checked regularly by a trained professional including the fixed electrical installation – this must be carried out to local law, but at least a minimum of every three years.
- Changes in electricity requirements must be checked on a regular basis so that changes to electrical equipment can be made.
- A written maintenance book for all electrical equipment and installations should be kept.

Annual Safety Certification.

The following should be independently and externally checked on an annual basis:-

- Passenger lifts, lifting equipment & lifting tackle.
- Pressure systems such as compressed air receivers and pipe work.
- Steam and pressured hot water boilers
- Gas Boilers.
- Fire sprinkler systems.

Machine Safety.

- Extra care must be taken in the cutting room, as this is the most dangerous room in the factory. This area should be kept clean and tidy.
- Personal Protective Equipment (PPE) must be provided e.g. when using circular hand cutters or band knives, dust masks and chain mail cutting gloves should be provided and used.
- Workers must be specifically trained to operate any dangerous equipment

PPE should be provided free of charge to the workers.

- Factories should educate any workers reluctant to wear PPE
- Do ensure that signs are posted illustrating the requirement to use PPE and encourage its use.

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Examples of PPE are:-

1. Dust mask and gloves used for cutting
2. Hair Nets
3. Ear Plugs

Noise and Light Levels.

- The factory is responsible for checking the noise level where machinery or a process is considered to be noisy.
- If the noise levels exceed the recommended maximum level the ear defenders protection (PPE) should be provided and used.
- If a noise is registered above 85dba earplugs should be systematically provided
- Factory should check lighting levels to ensure that there is sufficient light for each work station.
- Where detailed work takes place, the positioning of light must be taken into account.

Protection of the Environment.

- Factories must carry out their work in accordance with national laws, regulations, administrative practices and policies relation to the preservation of the environment in the countries which they operate as well as in accordance with the relevant international agreements, principles, objectives, responsibilities and standards with regard to the environment.

How to:

1. All hazardous chemicals within the factory must be inventoried.
2. All relevant staff must be trained to understand the importance of environmental procedures and protection.
3. Waste water must be treated before disposal (to legal standards as a minimum)
4. Containers must be cleaned before disposal or returning to the provider.
5. All substances must be correctly labelled and stored safely away from workers.
6. All chemicals must have a Material Safety Data Sheet and should be in the local language and stored with the chemicals
7. All waste chemicals and containers must be disposed of in accordance with the law and the instructions from the chemical provider to avoid environmental pollution.
8. Management and relevant responsible workers must be aware of all relevant international and national laws and regulations and also best practice procedures for their industry.
9. Implement a management system and document this for the disposal of waste.
10. Carefully manage and document a process for the storage of hazardous substances and chemicals.

Intellectual Property.

- These are logos, brand names and designs protected and owned by Isabella Oliver (Including Baukjen).
- The above are exclusive to Isabella Oliver and cannot be used by any third party without the written consent of Isabella Oliver.
- Isabella Oliver takes abuse of its IP very seriously, this includes but is not limited to, copying product designs, selling unauthorised production from the factory,

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incorporating trademarks or logos into other non-Isabella Oliver products, using Isabella Oliver patterns and fabric for other customers.

How to:

1. Factory must keep finished goods and raw materials bearing Isabella Oliver's IP safely and securely out of sight from factory windows and doors.
2. Restricted access to areas where Isabella Oliver IP is kept
3. Tell us if you think someone is selling finished goods or raw materials bearing any Isabella Oliver/Baukjen IP.
4. Do tell us if there has been a theft at your premises or on one of your vehicles.
5. Do shred any excess items bearing Isabella Oliver/Baukjen IP; this includes specification sheets, so that these cannot be used by others.
6. Do communicate all excess goods of raw materials at the end of each manufacturing season and await instructions of how to dispose of them

Please help Isabella Oliver maintain its integrity and value by respecting this policy and implementing it.