

# Code of Conduct



## HUMAN & LABOUR RIGHTS

**FORCED LABOUR |**  
Employment must be freely chosen. Suppliers must not use or support any form of slavery, forced, or bonded labour.

**CHILD LABOUR & YOUNG WORKERS |**  
Child labour is not permitted and special protection to young workers must be enforced.

**EMPLOYMENT LETTERS |**  
All employees have legal and understandable employment letters in place.

**WAGES |**  
Employees receive a fair wage.

**WORKING HOURS AND LEAVE |**  
Decent working hours and all type of leave comply with local regulations

**NO DISCRIMINATION AND HARASSMENT |**  
Discrimination against workers is not permitted. Gender equality, diversity and equal opportunities are actively promoted.

**FREEDOM OF ASSOCIATION |**  
The right of workers to form associations, unions or engage in collective bargaining in a free and democratic way is respected.

**ETHICAL BUSINESS BEHAVIOUR |**  
High ethical standards are enforced, and any acts of corruption, extortion, or bribery are not tolerated.



## WORKING CONDITIONS

**OCCUPATIONAL HEALTH AND SAFETY |**  
A safe and hygienic working environment must be provided for all employees.

**WORKERS INVOLVEMENT & PROTECTION |**  
Workers are informed about their rights and responsibilities while competencies are continuously developed.



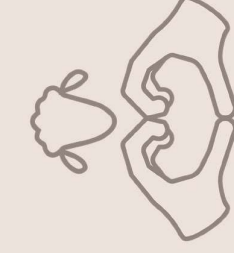
## ENVIRONMENT & RESSOURCES

**WATER RESOURCES |**  
All operations take necessary measures to support water conservation, water quality, and wastewater.

**ENERGY EFFECENCY |**  
All operations take necessary measures to support energy efficiency and the use of renewable energy sources if accessible.

**CHEMICALS |**  
All operations must comply with latest international restrictions.

**WASTE MANAGEMENT |**  
All waste is responsibly managed and reduced.



## ANIMAL WELFARE

**PROTECTION OF ANIMALS |**  
All materials used in products derived from animals that have been treated humanely.

**PROHIBITED PROCESSES |**  
Animal materials and processes we do NOT accept.



## IMPLEMENTATION

**APPROACH & IMPLEMENTATION |**  
Applying responsible production and supply chain management.

**TRANSPARENCY & COLLABORATION |**  
Working together with an open and transparent dialogue.

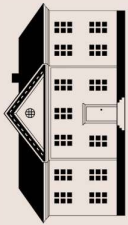
**CODE OBSERVANCE |**  
Continuous evaluation and improvement to protect worker's rights and the environment is conducted.

**GRIEVANCE MECHANISM |**  
Suggestions and complaints from all employees are collected and addressed.

**COMMITMENT |**  
Willingness and collaboration agreement



HOUSE OF NOA NOA  
NOA  
UN/MADE  
COPENHAGEN



HOUSE OF NOA NOA  
NOA  
NOA  
UNMADE  
NOA  
COFFRAGERS

# House of Noa Noa Code of conduct

This Code of Conduct describes the ethics that House of Noa Noa wishes to promote. We are committed to running a responsible and corporate sustainable business (CSR). We regard this dedication as the foundation of our company both here in our company and in our work around the world.

We ask our partners – suppliers, subcontractors, agents e.g. – to commit to implementing the standards, processes, and requirements of this Code of Conduct in their own operations and to work with their suppliers and business partners to also implement the policies, standards, and processes of the Code.

We use this Code of Conduct to support us in selecting and retaining business partners. Framed by integrity and fairness and as a core of this commitment, we wish to ensure that our products are produced under legal, safe, and responsible conditions of all employees in our supply chain.

Our commitment implies having in place policies and processes for preventing and addressing adverse impacts on the following requirements, guided by principles for implementation of the Code.



**Human and Labour  
rights**



**Working conditions**



**Environment**



**Animal Welfare**



**Implementation**

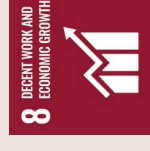
# Context

Our ethical guidelines are based on internationally agreed conventions, including but not limited to: the International Labour Organisation's (ILO) Declaration of the Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the Amfori BSCI principles, and the UN Global Compact's ten principles highlighting important challenges tied to the environment, corruption, workers', and human rights. In addition to the UN Global Compact, we are working with selected United Nations Sustainable Development Goals (SDGs) as a framework for our ethic business and responsible development.

We expect all our partners to respect the Code of Conduct and actively do their utmost to follow the standards. Furthermore, that all operations are in full compliance with applicable standards on human and labour rights and working conditions as well as local laws and regulations, including obtaining and maintaining all necessary registrations, permits, and licenses.

The Code of Conduct applies to every level of our supply chain from farm to garment factory, including all subcontractors and sub-suppliers, and we expect that our suppliers will request their supply chain to comply with these requirements. Furthermore, the Code equally applies to permanent, temporary, and agency workers, as well as piece-rated, salaried, hourly paid, legal young workers (minors), part time, night, and migrant workers.

We believe in collaboration and willingness, and we support our suppliers in achieving workable solutions in each individual case where the supplier does not conform to the standards. Though we recognise that establishing the required standards and processes outlined in this Code requires both time and resources, we feel confident that cooperation and transparent dialogue can result in a more sustainable and efficient partnership from which both parties will benefit.



## Our main SDGs

*“Responsible consumption and production” by working to change our own everyday patterns behaviour to lower the number of resources we use and to get a more integrated understanding of how our actions affect the world and people around us.”*

*“Decent work and economic growth” to promote inclusive and sustainable economic growth, employment, and decent work for all, with a special focus on the working conditions in the textile industry.”*

## Our supporting SDGs





# Human and Labour rights

**FORCED LABOUR** | Employment must be freely chosen. Suppliers must not use or support any form of slavery, forced, or bonded labour.

- This principle aims to protect all workers within the supply chain from recruitment fees or deposits, lodging of personal documents by the employer, or forced overtime. Business partners shall ensure that workers are not subject to inhumane treatment, corporal punishment, or any form of abuse. Workers are hired based on documented contracts according to law.
- Business partners will risk allegations or complicity if they benefit from the use of such forms of labour.
- Before entering employment, business partners are to provide workers with clear and understandable information about their rights, responsibilities, and employment conditions.
- All disciplinary policies must be established in writing.

**CHILD LABOUR & YOUNG WORKERS** | Child labour is not permitted and special protection to young workers must be enforced.

- This principle aims to protect children from any form of exploitation. Suppliers must establish age-verification mechanisms as part of the recruitment process, which may not be in any way disrespectful to the worker.
- Suppliers must not use child labour below the age of 15, even if permitted by national law. All legal limitations regarding young workers between the age of 15 and 18 must be followed and young workers are only permitted to carry out light work at reduced hours. This means that they must be protected from any hazardous work, night shifts, and any kind of work that might hamper their

physical and psychological development or impose any harm. Further, their working hours must not prejudice their attendance at school or their capacity to engage in training programs.

- Special care is to be taken on the dismissal of children, as they can move into more hazardous employment, such as prostitution or drug trafficking. In removing children from the workplace, business partners should identify in a proactive manner, measures to ensure the protection of affected children.

**EMPLOYMENT LETTERS** | All employees have legal and understandable employment letters in place.

- This principle aims to protect all employees, including temporary and casual workers, right to legal employment letters, specifying conditions and termination and written in a language they understand.
- Employment letters must follow international conventions and social security laws and regulations and not be avoided by using short-term contracts, such as contract labour and casual labour.

**WAGES** | Employees receive a fair wage.

- This principle aims to respect the right of workers to receive fair wages. Suppliers should work towards providing a fair living wage, implying that wages are enough to provide a decent living for workers and their families. Further, wages and benefits must be paid regularly and in a timely manner and not be withheld.
- Wages for a standard working week must at a minimum meet the legal minimum wage, industry standards or collectively bargained wages, whichever is higher.
- Real wage growth must be continually monitored, and deductions are only



permitted if and to the extent prescribed by law or fixed by a collective agreement. Deductions shall not be used as a disciplinary practice.

- All overtime work must be compensated at a premium rate which is recommended to be no less than 125% of the regular pay rate.

### **WORKING HOURS AND LEAVE | Decent working hours and all type of leave comply with local regulations.**

- This principle aims to ensure that standard working hours and leave of all matters follow local regulations, collective bargaining agreements, and industry standards. Standard working hours must not exceed 48 hours per week, excluding overtime.
- All overtime must always be consensual and not requested on a regular basis. Weekly overtime must not exceed 12 hours.
- Employees must have daily breaks and be allowed a minimum of 1 day off per week and paid annual leave. Maternity leave, sick leave, and other types of leave must be provided to all employees in accordance with relevant local regulations.

### **NO DISCRIMINATION AND HARASSMENT | Discrimination against workers is not permitted. Gender equality, diversity and equal opportunities are actively promoted.**

- This principle aims to ensure that discrimination in recruitment and in employment are prevented and that all workers are treated with respect and dignity. Decisions about hiring, compensation, access to training, advancement, discipline, termination, or retirement must be solely based on the ability to perform the job and not on the grounds of gender, marital or parental status, pregnancy, race, caste, colour, age, sexual orientation, religion, political opinion,

union membership, function as worker representative, nationality, ethnic origin, health status, or disability.

- Suppliers must at all time prevent the use of bullying, intimidation, violence, threats of violence, corporal punishment, or physical, sexual, psychological, and verbal harassment or abuse. Procedures to ensure punitive measures in cases of harassment or discrimination must be put in place.
- Special measures must be put in place to protect female workers against gender-based violence and harassment in the workplace.

### **FREEDOM OF ASSOCIATION | The right of workers to form associations, unions or engage in collective bargaining in a free and democratic way is respected.**

- This principle aims to protect the worker's right for association and collective bargaining. Suppliers must respect the rights of workers to join and organise associations in a free and democratic way and to bargain collectively with no interference or sanctions from employers.
- Workers' representatives shall have access to workers in the workplace or from interacting with them.
- The supplier must implement mechanisms, such as worker participation committees, for resolving disputes, a grievance mechanism and ensure effective communication with employees and their representatives.
- If the rights to freedom of association and collective bargaining are restricted by national law, the supplier must allow workers to freely elect their own representatives, and alternative forms of worker representation must be supported.





**ETHICAL BUSINESS BEHAVIOUR** | High ethical standards are enforced, and any acts of corruption, extortion, or bribery are not tolerated.

- This principle aims to ensure that suppliers act according to high ethical standards with integrity in all matters related to their business.
- No form of corruption, extortion, kickbacks, facilitation payments, or bribery must be offered, received, or promised are done.
- Suppliers should collect, use, and otherwise process personal information from workers, business partners, customers, and consumers with reasonable care and respect of privacy.



# Working conditions

**OCCUPATIONAL HEALTH & SAFETY** | A safe and hygienic working environment must be provided for all employees.

- This principle aims to ensure that decent work is safe by preventing work-related accidents and injuries and promoting a healthy and safe work environment.
- Working Environment and Safety**
- Management representatives for health and safety and/or procedures on incident and risk must be in place. Safe working conditions for all employees are ensured and dangerous working practices is not permitted.
  - Buildings are safe and healthy and all relevant certificates and material regarding building safety should be kept for review. Adequate air circulation, windows, fans, air-conditioning, radiators as well as light for different work-related activities are installed and ensured. Safe electrical installations are handled and maintained by competent personnel.
  - Employees always have access to clean drinking water as well as sanitary facilities.
  - Company-provided dormitories, restrooms and other sanitary, changing rooms, and canteen meet basic needs and uphold appropriate standards on hygiene, health, and safety.
  - All machines are equipped with operational safety devices and inspected and maintained regularly. Safety gloves, masks, and other protective equipment is available to employees and provided by the supplier, free of charge. Personal protective equipment (PPE), free of charge and in good condition, against damages to hearing, sight, inhalation is always provided and training in the proper use of the PPE is conducted.
  - The frequency of work accidents is monitored and statistics are kept.
  - Special measures must be put in place to ensure a gender-sensitive approach.



## Fire and First Aid

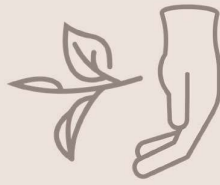
- Passages, stairways, exits are always unobstructed and main exits never locked during working hours. Indication of location of escape routes is clear and adequate equipment for fire safety is available.
- Fire alarms are placed in each production unit and regularly checked and maintained.
- A fire drill is held at least once a year. Employees are educated on fire safety and evacuation while several employees are trained for proper use of fire extinguishers and on providing first aid on spot.
- At least one regularly updated and well-stocked first aid kit is placed in each production unit.
- Procedures for the handling of serious accidents that require treatment outside the production unit are in place by the supplier.

## Handling Chemicals

- Health and safety training on handling hazardous and/or toxic materials and chemicals and informing employees about the consequences of working with them must be conducted. Special training is given to workers in direct contact with the substances.
- Hazardous and/or toxic substances are stored safely in locations that are adequately ventilated. Handling of these materials is done safely.
- Procedures in case of accidents involving chemicals are completed and available.

## WORKERS INVOLVEMENT & PROTECTION | Workers are informed about their rights and responsibilities while competencies are continuous developed.

- This principle aims to ensure that workers and their representative are well informed, protected, and educated regarding workplace issues. Specific steps to make workers aware of their rights and responsibilities must be established.
- Continuous training at each level of work is essential, particularly regarding health and safety as well as competency development must be conducted.
- Effective operational-level grievance mechanisms to collect complaints and suggestions for individuals and communities who may be adversely impacted should be established.
- It is encouraged that all employees are educated on social and environmental sustainability through mandatory training programmes.



# Environment & resources

## **WATER RESOURCES** | All operations take necessary measures to support water conservation, water quality, and wastewater.

- This principle aims to support that the use of water during production throughout the supply chain is minimised and done according to environmental laws and regulations.
- Measures must be put in place to clear wastewater and to manage water consumption.
- Suppliers must work towards minimising the use of water during production processes, including introducing water saving techniques and waste-water recycling. This is particularly pertinent for suppliers with wet processing.
- It is encouraged that suppliers work towards measuring the impact of their operations on the local/regional water supply to avoid negatively contributing to water stress.

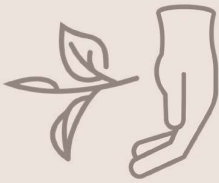
## **ENERGY EFFECIENCY** | All operations take necessary measures to support energy efficiency and the use of renewable energy sources if accessible.

- This principle aims to support mitigating negative impact on climate change by using energy responsibly.
- Suppliers must work towards implementing energy efficiency measures in the value chain, starting with high-impact processes, and using renewable energy sources if available.
- Suppliers must work towards calculating emissions and setting targets to reduce the emissions using recognized standard-setting-tools.

## **CHEMICALS** | All operations must comply with latest international restrictions.

- This principle aims to ensure that all suppliers conduct their operations in accordance with the following requirements on chemicals:
  - o [The European Union REACH Regulation \(EC\) No 1907/2006 Annex XVII](#) and later amendments.
  - o The “substances of very high concern” (SVHC) i.e. the [European Union REACH Regulation \(EC\) no. 1907/2006 Candidate List](#). Suppliers are requested to check the list on a regular basis as this list is continuously updated.
  - o Country specific regulations on export markets.
- Local laws must be followed in the storage, handling, use, and disposal of all chemicals and must comply with the Material Safety Data Sheet (MSDS) for each chemical product.
- An account of the chemical composition of the dyes used in production must be available and the supplier is expected to ask for a declaration of the content of the dyes from the supplier of dyes. Any specifications submitted by the supplier of dyes should be verified by an internationally recognized laboratory.
- The content of chemicals in processed garments and goods is controlled by lab tests required by House of Noa Noa. All suppliers must follow test methods.





## **WASTE MANAGEMENT** | All waste is responsibly managed and reduced.

- This principle aims to ensure that all waste is managed responsibly and as a minimum according to applicable regulations.
- Suppliers must work to improve resource efficiency e.g. by implementing cleaner production techniques and reduce waste during production processes.
- Suppliers must at best implement methods for reuse or recycle waste. Collection of waste to be re-used, reduce use of virgin raw materials, and optimize use of re-cycled materials and fibres must be facilitated. The goal should be no waste to landfill.
- Hazardous waste and/or toxic substances must be handled by an authorized company/organisation in accordance with applicable law.
- Suppliers should keep detailed records on resource consumption as well as waste production and emissions to ensure effective monitoring. This information must always be available to House of Noa Noa on request.

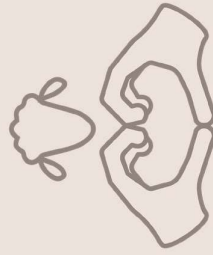
# Animal welfare



## **PROTECTION OF ANIMALS** | All materials used in products derived from animals that have been treated humanely.

- This principle aims to ensure that all animals have been allowed to live free of hunger, thirst, fear, distress, pain, injury, or disease and treated according to all applicable regulations, conventions, and standards. The animals are fed and treated with dignity and respect. No animal must deliberately be harmed nor exposed to pain in their lifespan.
- Taking the lives of animals must always be conducted using the quickest and the least painful and non-traumatic method available, and approved by national and acknowledged veterinarians, and only conducted by trained personnel.
- When using materials that derive from animals, the supplier is encouraged to document the chain of custody of the product, e.g., via existing credible third-party certifications schemes such as the Responsible Down Standard (RDS) and the Responsible Wool Standard (RWS). It is required that all wool is to be declared Non-Mulesed or Ceased Mulesed Wool according to National Wool Declaration. A certification as proof is required.
- House of Noa Noa only accept leather from animals that have been bred for food production and documentation for membership of the Leather Working Group is required.

# Animal welfare



## PROHIBITED PROCESSES | Animal materials and processes not accepted.

- This principle aims to prevent the use of the following materials and processes. Documentation and evidence must be provided by request.
- We do not use hides from farms located in areas where rainforests have been cut down to make room for farms.
- We do not use materials derived from species that appear on the CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) or IUCN (International Union for Conservation of Nature) lists of endangered species.
- We do not use leather from animals that have not been bred for the food industry. We do not use leather obtained from live-skinning or live-boiling.
- We do not use feather or down from birds that have not been bred and raised for the food industry. We do not use feather or down from greylag geese due to the risk that they have been force-fed or from birds that have been live plucked.
- We do not use wool from sheep that have been exposed to mulesing.
- We do NOT use Angora wool.



# Implementation

## APPROACH & IMPLEMENTATION | Applying responsible production and supply chain management.

This code of conduct is a measure to ensure that all employees in the supply chain are safe and to avoid environmental degradation are supported by this Code of Conduct. Implementing and sustaining the Code is an ongoing process framed by transparency and collaboration, code observance, and an operational grievance mechanism.

Ambitious implementation involves understanding as well as communicating the listed requirements above to business partners, prioritizing guidelines and balancing the requirements with each business partner with the further aim of co-developing on specific policies and guidelines. Furthermore, regular communication and employee involvement are needed whilst also providing necessary ongoing training. Reporting on improvements and challenges as well as internal and external monitoring of the Code's effectiveness and effect on subcontractors must be conducted. Furthermore, the Code should be practiced and promoted by management to lead the way for staff and employees that live the culture should be rewarded.

## TRANSPARENCY & COLLABORATION | working together with an open and transparent dialogue.

- Collaboration and transparency are essential to our relationship with all our suppliers and a key to credibility. This principle aims to ensure a joint approach as well as an open and transparent dialogue on the standards of this Code of Conduct.
- Suppliers are expected to inform about all sub-contractors - Hidden factories are not accepted. All production locations must at all-time be transparently informed and kept updated.



- Collaboration implies co-developing on specific policies, standards, and training adjusted to each business partner regarding the above requirements. Suppliers are expected to collaborate with sub-contractors based on the guidance of this code.
- Transparency implies openly exchanging information to timely identify any challenge that requires mitigation when developing, implementing, and sustaining specific policies and standards of this Code, likewise when reporting improvements.
- Involve and inform workers on the ongoing processes regarding implementing the Code and hand out copies of the Code and specific policies within the present requirements. Welcome feedback from all employees.

### **CODE OBSERVANCE | Continuous evaluation and improvement to protect worker's rights and the environment is conducted.**

- This principle aims to ensure that suppliers and subcontractors are monitored and evaluated through different types of assessment and reporting on improvements. This includes self-assessments, internal assessments House of Noa Noa , and third-party assessments such as quality checkers or audits (announced and unannounced) while also reporting continued improvements annually.
- House of Noa Noa and appointed third-party quality checkers or audits must always be granted access to all facilities, relevant documents, and employees.
- All suppliers are evaluated against the standard of the Code, and we prioritise those suppliers who are committed to demonstrating compliance and continued improvements. If a supplier demonstrates lack of commitment and will to engage and improve on the standards of this Code, we will not hesitate to terminate the business relationship.

### **GRIEVANCE MECHANISM | Suggestions and complaints from all employees are collected and addressed.**

- This principle aims to ensure that a way to report breaches in a confidential manner are provided. Suppliers must have a grievance mechanism in place allowing stakeholders and all employees to voice their concern if they find that operations of the supplier are adversely affecting human and labour rights, environment, ethical business behaviour, and animal welfare.
- The grievance mechanism should be appropriate to the size and resources of the company and can take the form of a whistle-blower function, worker representation committee, anonymous reporting hotline e.g.
- The grievance mechanism should be widely communicated and accessible to all workers (including temporary workers), and managed in a confidential, unbiased, timely, and transparent manner to protect workers when complaints and grievances are reported in good faith.

### **COMMITMENT | willingness and collaboration agreement.**

We trust that our suppliers and business partners will embrace and commit to use reasonable endeavours to achieve the present requirements set out in this Code of Conduct House of Noa Noa believes that achieving ethic, healthy, and environmental standards is a process, and we are committed to working together with our suppliers and business partners in their efforts. In those instances where a supplier needs to improve certain procedures and practices, the supplier must be committed to do so within a specific timeframe. In countries where domestic laws and regulations conflict with or set a different standard of protection than the code of conduct, business enterprises should seek ways to abide by the principles that provide the highest protection to the workers and environment.



# Implementation & agreement

Although considered a last resort, lack of commitment and willingness to engage and improve on co-developed policies and standards of this Code, termination of the business relationship will be conducted.

Seeing this Code of Conduct as a process and working tool for continued improvements is essential. Developing, implementing, and sustaining policies within each requirement is a process that takes considerable time, resources, and effort and gaps, failures, and unpredictable occurrences will always remain a possibility. All business partners commit strongly to monitoring and remediation of all such failures in their supply chains and to remain transparent and open to constructive engagement and collaboration. If you have any questions regarding our Code of Conduct, or our responsible supply chain management in general, please do not hesitate to contact our offices.

Supplier hereby declare to have read, understood, and accepted the conditions listed in the Code of Conduct.

The signed document is to be returned to House of Noa Noa.

House of Noa Noa,  
December 2021

Date & place

31.01.2022

Signature by brand

Date & place

Name and title

Signature by supplier