

Responsible Sourcing Code of Conduct

2021



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Bendon's Responsible Code of Business Conduct provides the foundation for our supplier partners and us, to evaluate a facility's social and ethical framework, performance and progress. Which sets forth the key principles under which the company and its worldwide affiliates are required to operate. Bendon's conduct of business with employees, customers, suppliers, their production factories and others shall be on an honest, fair and equitable basis. It has been and will continue to be the Bendon's policy to obey the laws of each country and to honour our obligations to society by being an economic, intellectual and social asset to each community and nation in which we operate.

In selection of our supply base, we work hard to choose reputable business partners who are committed to ethical standards and business practices compatible with those of Bendon. We expect all suppliers and their production factories to comply with all legal requirements applicable to their operations and employment in the country in which they are based.

The purpose of the terms set out in this Responsible Supplier Code of Conduct is to make clear that, taking into consideration differences in cultures and legal requirements, we expect that wherever our products are manufactured they will be manufactured in a manner compatible with the high standards that have contributed to the outstanding reputation of Bendon and its brands. Each of our suppliers and its production factories agrees that by accepting orders from us it will abide by and implement the terms of our Responsible Code of Conduct.

All of our suppliers must sign and agree to our 'Responsible Supplier Code of Conduct' agreement prior to commencing work with us.

AUDIT AND INSPECTION CHECKS:

Bendon has partnered with Qualspec SgT, our nominated independent third-party provider to carry out technical audits, social compliance audits and inspection checks on our behalf.

Bendon, through Qualspec SgT will carry out announced, semi announced and unannounced visits to nominated factories working on Bendon product. These are listed as our Tier 1 Suppliers. Qualspec SgT will contact suppliers to arrange audits and inspections.

Social Compliance audit protocol is based on:

- ETI standards
- International Labour Organisation Conventions Numbers 138 (C138-Minimum Age(s)1973) and 182 (C182-Worst Forms of Child Labour Convention, 1999)
- United Nations Universal Declaration of Human Rights

Costs for Social Compliance audits will be managed as follows:

Bendon will pay for initial audits; suppliers are responsible for costs of all subsequent on-site follow up and desk top audits.

All suppliers must provide Bendon with current and accurate factory name, full street address, town and province location and worker numbers for all facilities making our product.

During the audit process if any vendor falls below minimum expectations set out in this Responsible Code of Conduct, the supplier must take corrective action as a priority to rectify the non-conformances identified including acceptance of on-site follow up audits if required. Failure to satisfactorily close non-conformances will compel Bendon to reevaluate, and possibly terminate, its business relationship with that supplier.

The following terms of engagement are non-negotiable:

1. BRIBERY AND CORRUPTION

Factories must act with integrity and honesty. All record keeping must be accurate and transparent at all times. Bribery and corruption is prohibited in any form.

2. LABOUR RIGHTS AND FORCED LABOUR

Factories must not engage in or support the use of forced labour, bonded labour, indentured labour, prison labour or human trafficking. Further, factories shall respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment.

3. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Bargaining factories must to the extent permitted by local laws, respect the right of their workers to freedom of association and collective bargaining. This includes the right to form and join trade unions or other work associations of their own choosing without harassment, interference, or retaliation.

4. WORKING CONDITIONS

There shall be the provision and promotion of a safe and healthy work environment with systems in place to reduce worker injury and accidents in the workplace. This should include compliance with up-to-date fire safety laws and the implementation of evacuation procedures and emergency plans. Employers shall ensure that workers have access to clean drinking water, sanitary washing facilities and an adequate number of toilets. All suppliers shall minimise or eliminate, as far as reasonably practicable, the causes of all hazards in the workplace environment. Hazards shall include, but not limited to; fire safety, building safety, machine safety, chemical safety, and health safety.

5. CHILD LABOUR

Factories must not engage in or support the use of child labour. No supplier shall engage in or support the use of child labour under 15 years of age, unless the minimum age for work or mandatory schooling is higher by local law, in which case the stipulated higher age applied in the location. Employers must verify the age of their employees and maintain copies of their workers proof of age. These must be readily available on request during audit process. Furthermore, young workers must not be exposed to any conditions, inside or outside the workplace, which are hazardous or unsafe to their physical and mental health.

6. LIVING WAGE

Factories must comply with all laws regulating local wages, overtime compensation and legally mandated benefits. In any event, wages should always be enough to meet a workers' basic needs and provide some discretionary income. Bendon supports Living Wage and encourage all our suppliers to meet Living Wage benchmarks.

7. WORKING HOURS

Under ordinary business circumstances, workers must not be required to work excessive working hours per week, including overtime. All overtime shall be reimbursed at a premium rate as defined by national law or established by a collective bargaining agreement.

Normal hours of work per week shall not exceed the maximum hours established by local law, overtime hours shall not exceed the maximum hours established by local law, and workers are to receive leave entitlement of a least one day off per working week.

All suppliers shall comply with applicable laws, collective bargaining agreements (if applicable) and industry standards on working hours, breaks and public holidays.

8. DISCRIMINATION

Factories must provide a working environment where workers are treated fairly and without discrimination. All conditions of employment must be based on the individual's ability to do the job, not on the basis of personal characteristics such as age, race, ethnicity, colour, nationality, gender, religion, caste, marital or maternity status, sexual orientation, disability or political beliefs.

9. HIRING AND REGULAR EMPLOYMENT

Factories must provide each worker with a labour contract which stipulates all legally required employment terms and conditions. In addition, factories must not use labour-only contracting arrangements, consecutive short-term contracts, excessive piece-work or false apprenticeship schemes to avoid obligations of regular employment to workers.

10. HARRASSMENT AND ABUSE OR INHUMANE TREATMENT

Factories must not engage in or support any form of harassment or abuse in connection with a workers' employment, including physical, sexual, verbal, or visual behaviour that creates an offensive, hostile or intimidating environment.

11. ENTITLEMENT TO WORK AND IMMIGRATION

Only workers with a legal right to work shall be employed or used by our suppliers. All workers, including employment agency staff must be validated by supplier for their legal right to work by reviewing original documentation.

12. SUB-CONTRACTORS

All suppliers must disclose accurate information regarding the name and location of all production facilities that are being used to make our product. Those factories are considered to be, manufacturing factories and are subject to follow the same conditions of agreement written in this Responsible Code of Conduct.

13. ENVIRONMENTAL RESPONSIBILITY

All suppliers shall comply with local environmental law and take effective steps to prevent potential environmental incidents arising out of its activities. All suppliers shall minimize or eliminate, so far as is reasonably practicable, the causes of all environmental impacts based upon the prevailing environmental protection. We expect suppliers to be familiar with and take action to address REACH and ZDHC or AFFIRM MRSL/RSL Hazardous Chemical Lists to ensure compliance for raw materials and manufacturing facilities.

14. RAW MATERIALS

All raw materials must be ethically sourced, and the standards outlined in the code of conduct must flow into all parts of their supply chain. Suppliers must not knowingly use cotton that is sourced from Uzbekistan, Xinjiang province in China or from any country of origin where child labour is known.

15. NEEDLE DETECTION

Bendon requires all product to pass through metal detection machines calibrated to detect sewing needles as the final stage before packing goods.

16. RIGHT OF INSPECTION

Bendon expects all suppliers to respect and comply with our Responsible Code of Conduct. Bendon reserves the right to make unannounced, semi-announced, and announced visits to all associated manufacturing suppliers to Bendon. This will be done through our nominated agent SgT Qualspec on our behalf, to ensure all suppliers and facilities comply with our Responsible Code of Conduct document.

17. COMPLIANCE WITH THIS POLICY

Factories must have in place a compliance management system to ensure compliance with applicable laws and regulations, conformance with the Responsible Code of Conduct ,and identification and mitigation of compliance risks related to the Responsible Code of Conduct. Bendon requires suppliers to post this summary in local language in clearly visible locations in the factory, canteen and any other place where it is visible to all workers. Training in understanding our Responsible Code of Conduct should be included in worker training and re-training sessions, with records of discussion dates kept ready for auditor review.

18. REPORTING VIOLATIONS

Any person, including factory workers, may report actual or suspected violations to our Responsible Code of Conduct to Bendon via our Compliance team ethicalsourcing@bendon.com. All reports will be followed up. The identity of anyone who makes a report will be kept strictly confidential, unless requested otherwise.

VENDOR ACKNOWLEDGEMENT – CODE OF CONDUCT

By signing the below, you acknowledge that you have read, understood and agree to the requirements and terms set out in this agreement.

Vendor to complete:

Vendor name:	
Contact name:	
Contact number:	
Contact Position / Title:	
Signature:	
Date:	
Company Stamp:	