



# SUPPLIER CODE OF CONDUCT

## Foreword

The Baby Gifting Company exists to combine the joy of luxurious baby gifting with our passion for environmental sustainability. To provide our friends, family, and the wider community with the opportunity to give and receive high-quality, personal, practical, and inclusive gifts that will become a future family treasure.

To achieve our mission, we do the following:

- We preserve our environment by offering products that are made by renewable and recycled materials.
- We combat waste without sacrificing the joy in unwrapping a premium gift, through recyclable packaging.
- Our gifts are uniquely made for each baby, allowing friends and family to give a treasure that will stay in the family for generations.
- We are inclusive of babies with additional needs without making them feel different, by including tactile sensory toys designed to engage and stimulate their baby's senses and aid early development.
- To support our local community and bring health and equality to mothers and children through donation.

To achieve our mission above, we need to work with other businesses, especially our suppliers. This Code of Conduct (Code) is made of two parts – environmental and social criteria.

The criteria of this document is influenced by the International Labor Organization's (ILO) core conventions and the Universal Declaration of Human Rights, outlines the minimum level of standards we expect from our suppliers.

We thank you in advance to helping us achieve our mission together.

Best regards,



The Baby Gifting Company



## Scope

This Code applies to all our suppliers, their employees, parent, subsidiary or affiliated entities, and subcontractors. We expect suppliers to ensure that this Code is accurately communicated to the stakeholders and that it is done in the local language where required. We require all suppliers to read this code and acknowledge it in writing.

In each section, we will explain how The Baby Gifting Company intends to verify compliance to this Code.

## General Policy

### Transparent Disclosures

The Baby Gifting Company procures baby products of the highest safety standards. We select suppliers based upon their choice of natural raw materials that are environmentally conscious, and also are concerned of its social responsibilities as an employer.

As a principle, the Baby Gifting Company favors companies that are willing to provide a copy of their raw material and product certifications to us. We seek companies that source the most sustainable raw materials for their manufacturing and have sustainable manufacturing processes. Given our international supply chain, it is not possible for us to personally visit each supplier we work with. For that reason, we heavily rely on the certifications that you will provide us.

We will make certain that all disclosures made in our public documents are full, fair, accurate, timely and understandable. We expect that our suppliers will uphold the same integrity, no business goal of any kind is ever an excuse for misrepresenting facts or falsifying records. This includes any disclosures with regards to the country of origin, identity and location of the sources of components and raw materials.

Suppliers must transparently disclose all environmental and social certifications, and when they cease to be effective, so not to mislead us and our customers.

**Compliance:** To all possible extents we will save and verify certifications that we receive from our suppliers to perform regular checks to validate that the certifications continue to be valid.

For example, we validate all packaging and paper solution suppliers that claim that they use FSC material using [the database](#) made publicly available by FSC, and all WRAP



compliance claims for safe, lawful and ethical manufacturing can also be validated on the [WRAP certification database](#).

## Audits and Continuous Improvements

The Baby Gifting Company is committed to upholding the policies as detailed in this Code. In the instance of a breach in the Code, we will always communicate with the supplier in the spirit of collaboration to correct the situation.

For the duration of the supplier's relationship, The Baby Gifting Company reserves the right to verify compliance with this Code through internal or third-party assessments.

We also recognize that compliance with this Code is a dynamic process, and we appreciate suppliers that encourage continuous improvement within its policies and procedures. In case any improvements have been identified we will support our supplier to establish clear milestones and processes to support their achievement.

If a supplier does not demonstrate the willingness to collaborate, respond to our enquiries, we may terminate the supplier's relationship with immediate effect.

If any supplier has been found later to have misled us over any terms relating to this Code, we will seek to recover costs and related expenses.

## Environment Policy

We select suppliers primarily based on their environmental impact. It is important that the products we consume in the office and produce for our customers are true to our mission to preserve the environment.

## Zero-plastic Shipments

We need our suppliers to help us achieve our ambition of a zero-plastic supply chain.

As a rule of thumb, The Baby Gifting Company does not purchase any products that are made of or contain plastic.

As we build gift hampers and personalize most of the items, all The Baby Gifting Company products are repackaged the moment we receive the products. By sending us individual plastic packaging for each product will create waste that cannot be reused.



We request our suppliers to ensure that the products ordered are not shipped with plastic packaging, to the extent that it does not damage the products. Wherever possible, we would ask you to use non-plastic alternatives to protect the products during transportation.

**Compliance:** We will verify compliance with received shipments and communicate with our suppliers in written form (email) to request improvements.

**Supporting Resources:** The World Economic Forum published an article that demonstrated some alternatives towards plastic packaging (Click [here](#) to access article). We would like to draw your attention to example 3 – compostable packaging, or similar alternatives.

Where compostable packaging is not possible, we ask you to consider using packaging produced with recycled plastic from ocean waste.

## Zero-waste Production Ambition

The Baby Gifting Company has an ambition to reduce waste through providing long-lasting, quality products for our customers. Moreover, we have an environmental stewardship policy within our teams that aims to achieve a zero-waste office and operation.

We need our suppliers to work based on the same principles where they will strive to reduce waste and develop policies and procedures to do so. We also expect our suppliers to follow local recycling norms to the highest standards.

**Compliance:** We may ask you about your recycling practices and how your company is minimizing waste in its operations. In case you have an Environmental Management System (EMS) in place, we would ask you to share it with us so we can better understand your practices.

**Supporting Resources:** If you would like to create an Environmental Management System (EMS), we recommend that you use the ISO 4001 standards to help guide you through the important elements (Click [here](#) to access the official website).

## Low Emission Distribution

To help us reduce our Greenhouse Gas Emissions (GHG), we will always strive to combine orders as much as possible to avoid frequent shipments. We expect our suppliers to



provide us with low emission shipping options wherever feasible to help us reduce our emissions.

In addition, all suppliers must comply with any local and national applicable air emission laws and take all responsible steps to minimize and/or offset their GHG Emissions.

**Compliance:** We will work together during the ordering process to find the best solution.

## Responsible Chemical & Water Usage

Suppliers must comply with all applicable local laws and regulations relating to the user of water, management of wastewater, and the safe disposal of all chemicals being used.

As a principle, The Baby Gifting Company does not tolerate harmful chemicals in our products as our users are babies.

We purchase products that meet the highest standards in terms of using non-toxic paint, and textiles dying. It is imperative that our suppliers understand the grave consequences of not disclosing, or inaccurately disclosing, any types of chemical safety verifications.

The Baby Gifting Company will hold suppliers responsible both legally and financially for inaccurate disclosures that may harm our customers.

For textiles we require at minimum OEKO TEX 100, meeting product class 1 or the equivalent that is internationally recognized.

For toys we ask you to make sure that your products are in compliance with the EU Toy Safety Directive 2009/48/EC.

**Compliance:** Subject to the type of product being procured, we will ask you for a copy of company certification on meeting safety standards to confirm that your products are free of harmful chemicals.

The mentions above are not exclusive, and we will ensure that we research for the relevant certifications as our product range grows to keep our guidance clear.

**Supporting Resources:** You can refer to [this page](#) to find more details about OEKO TEX 100 standards and what it means to be product class 1.

For the EU Toy Safety Directive you can find more information from [this link](#), however we ask you to always check whether there have been any updated versions to the directive and assurance compliance at all times.



There is also a training delivered by *Sale non-food consumer products in the EU and China (SPEAC)* – [Webinar: Ensuring Toy safety and Compliance for the European Market](#). Please note that the video is hosted on Youtube, for suppliers in China you may have to access it through VPN.

## Social Responsibility

The below policy shares a common compliance activity, as found at the end of this section.

### No Child or Forced Labour

The Baby Gifting Company does not engage in nor condone the unlawful employment or exploitation of children in the workplace or the use of forced labour.

There shall be no recruitment of child labour by any of our suppliers. Children under the age of 15 shall not be recruited or employed (or higher age if required by the law). Children and young persons under the age of 18 shall not be employed at night or in hazardous conditions.

We also explicitly prohibit the use of forced, bonded, or involuntary prison labour. Workers must not be required to lodge deposits or their identity papers on commencement of employment. Workers must be free to leave their employer after reasonable notice.

### Anti-Slavery

We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. All suppliers must comply with our Anti-Slavery and Trafficking Policy.

### Freedom of Association and Employee Representation

Suppliers should respect the rights of employees to join or form an association of their choosing (such as workers council, union, or workers association).



Where law restricts the right to freedom of association and collective bargaining, the employer should facilitate, and not hinder, the development of parallel means for independent and free association and bargaining. Representatives must not be discriminated against and have access to carry out their representative function in the workplace.

## No Discrimination

There must be no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, gender identity, union, or political membership.

## Wages and Benefits of Employment

All employees must be paid a fair and competitive wage, in a timely manner, that allows them to meet their basic needs, have discretionary income, and the ability to save.

All overtime must be voluntary and compensated at a rate that fairly reflects the additional undertaking and complies with local labour laws.

All employees must be provided with opportunities for training and development.

## Working Conditions

Suppliers must provide all employees, agents and subcontractors safe and comfortable working conditions, minimize work-related illness or injury and comply with all local employment law including establishing health and safety policies and procedures.

Adequate and regular breaks must be provided and working hours must not exceed hours allowed by the law of the country where the workers are employed.

Workers must be free to and know how to raise complaints about their workplace without retaliation.





All persons must be treated with respect, dignity and shall not be discriminated against for any reason. Suppliers must ensure that no person shall be subject to abuse, intimidation, threat or harassment of any kind.

## Non-Harassment Policy

It is our policy to prohibit harassment of one employee by another employee or supervisor on any legally prohibited basis including, but not limited to, race, colour, religion, marital status, sexual orientation, national origin and ancestry, physical or mental disability and/or age. We extend this policy to our suppliers.

While it is not easy to define precisely what harassment is, it includes, but is not limited to, slurs, epithets, threats, derogatory comments, unwelcome jokes and teasing.

Any employee who feels that she or he is a victim of harassment should immediately report the matter to their manager. We expect that all suppliers must have a grievance mechanism in place allowing them to promptly investigate all such reports as confidentially as possible.

If warranted, disciplinary action up to and including involuntary termination should be imposed. The supplier must ensure that adverse action will not be taken against any employee who reports or participates in the investigation of harassment.

## Uphold the Law

The Baby Gifting Company's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. We expect all our suppliers to do the same.

## Anti-Bribery & Corruption

The Baby Gifting Company has a strict zero-tolerance policy for accepting bribery or engaging in corrupt business practices. This can involve anything of value including money, employment, discounts, gifts, or payment of expenses including travel and entertainment. Accepting bribes for the express purpose of influencing an outcome will not be tolerated.



## Compliance and Supporting Resources

**Compliance:** We will ask for copies of certifications that validate compliance with this policy. The accepted certifications are WRAP, BSCI or the equivalent examinations that carry the same international recognition.

**Supporting Resources:** If your company is considering to obtain certification, you may find useful resources about the Worldwide Responsible Accredited Production (WRAP) principles [here](#), or the Business Social Compliance Initiative (BSCI) [here](#).

## Acknowledgement

Acknowledgement by the Supplier:

|           |  |
|-----------|--|
| Company   |  |
| Signature |  |
| Full name |  |
| Position  |  |
| Date      |  |