# OUR BRANDS ETHICAL POLICIES



# **Supplier initiatives**

A large number of our suppliers adhere to several internationally recognised guidelines to ensure the ethical and social impacts of their actions are accounted for. Further insight into such initiatives are shown below:



#### www.ethicaltrade.org

The Ethical Trading Initiative (ETI) is a ground-breaking alliance of companies, trade unions and voluntary organisations. We work in partnership to improve the lives of workers across the globe who make or grow consumer goods — everything from tea to T-shirts, from flowers to footballs.

Our vision is a world where all workers are free from exploitation and discrimination, and work in conditions of freedom, security and equity. This year our corporate members' ethical trade activities touched the lives of over 9.4 million workers.

#### **Brands**

Front Row Tombo

Mumbles Tombo Teamwear Okarma Tour Collection Splashmacs Whytes



#### www.fairlabor.org

The mission of the Fair Labor Association (FLA) is to combine the efforts of industry, civil society organisations, and colleges and universities to protect workers' rights and improve working conditions worldwide by promoting adherence to international labour standards.

#### Rrande

adidas Gildan Craft



#### www.fairtrade.org.uk

Fairtrade is about better prices, decent working conditions, local sustainability, and fair terms of trade for farmers and workers in the developing world. By requiring companies to pay sustainable prices (which must never fall lower than the market price), Fairtrade addresses the injustices of conventional trade, which traditionally discriminates against the poorest, weakest producers. It enables them to improve their position and have more control over their lives.

#### **Brands**

Bagbase Quadra Beechfield Wombat

Premier



#### Oeko - Tex 100 Standard

#### www.oeko-tex.com

The testing and certification system of the Oeko-Tex® Standard 100 satisfies the many and varied requirements consumers make of modern textile products and at the same time takes into account the complex production conditions in the textile industry: global organisation, a strong tendency towards the international division of labour, different mentalities with respect to the use of potentially harmful substances.

#### Brands

B&C Collection Kariban Sailing
Bagbase Kariban Spaso
Beechfield Kariban Sport
Brook Taverner Madeira
Fruit of the Loom Okarma
Gildan Quadra
Hanes Results

Jerzees Colours Russell Collection Jerzees Schoolgear Russell Workwear

Kariban



#### www.wrapcomliance.org

Worldwide Responsible Accredited Production (WRAP) is an independent, global non-profit organisation dedicated to the certification of lawful, humane and ethical manufacturing throughout the world.

#### Brands

Craft Okarma Front Row Result Spiro Gildan Russell Workwear Hanes Russell Collection Jerzees Colours Splashmacs Jerzees Schoolgear Tombo Just Cool by AWDis Tombo Teamwear Just Hoods by AWDis Tour Collection Mumbles Whytes



#### www.sedex.org.uk

Connecting businesses and their global suppliers to share ethical data and enabling continuous improvements in ethical performance.

#### Brands Gildan



Our mission is to improve labour conditions in the garment industry.

Fair Wear Foundation (FWF) is an international verification initiative dedicated to enhancing workers' lives all over the world. We work closely with a growing number of companies that produce clothing and other sewn products and that take responsibility for their supply chain.

FWF keeps track of the improvements made by the companies it works with. And through sharing expertise, social dialogue and strengthening industrial relations, FWF increases the effectiveness of the efforts made by companies.

#### **Brands**

**B&C** Collection

# **Brand Directory**

Whytes

KARIBAN Kariban Page 6 Page 2 Adidas KARIBAN Kariban Sailing Just Cool by AWDis KARIBAN Kariban Spaso Just Hoods by AWDis Beechfield Kariban Sport Beechfield **%**KooGå Kooga BagBase **Kustom Kit** Quadra OUADRA Bargear Westford Mill **GAME**GEAR® Gamegear Bella **Gamegear Formula Racing B&C** Collection Grizzly BROOK TAVERNER **Brook Taverner** Page 3 & wardrobes Maddins maddins CRAFT ::-Page 7 Craft Madeira **Dickies** TheMagicTouch Fruit of the Loom Page 4 Portwest PORTWEST Gildan Glenmuir Page 8 Premier **PREMIER** Hanes Hanes Regatta Regatta 🌖 Craghoppers **CRAGHOPPERS** HENBURY Page 5 Henbury FINDEN -Result Finden+Hales Page 9 Result 5PIRO Front Row Spiro **larkwood** Larkwood RTY Enhanced-viz Mumbles RTY High-viz Okarma RTY Workwear Skinnifit RTXtra Skinnifitmen Skinni Minni Page 10 Slazenger splashmacs STORMTECH (A) Splashmacs Stormtech Tombo Football Page 11 Surridge Tombo Teamwear **SDL** Trophy TOWEL **Towel City** Wombat

WHYTES

# **Our brands**



Corporate social responsibility is a core element in the adidas Group's company strategy.

The adidas Group has made considerable progress in recent years which is recognised by international institutions, nongovernmental organisations (NGOs) and aid organisations.

The adidas Group use Workplace Standards as a tool to assist them in selecting and retaining business partners who follow business practices consistent with our policies and values.

As a set of guiding principles, the Workplace Standards also help identify potential problems in order to work with business partners to address issues of concern as they arise.





AWDis will only do business with vendors and suppliers that share the company's adherence to high legal, ethical and moral standards. AWDis's goal is to create and encourage creation of model operations that provide good jobs at fair wages and also improve conditions in their communities.

All suppliers, vendors and other business partners are expected to comply with AWDis Operating Principles and to assure compliance in all contracting, subcontracting or other relationships. In establishing these guidelines, AWDis believes it is effectively exercising its economic leverage with business partners to encourage their full compliance with laws designed to protect their employees and support the highest standards of business conduct.

The following guidelines have been developed to ensure consistent compliance by all suppliers and vendors. AWDis recognises that the Guidelines will also assist management in selecting business partners and follow work place standards and practices consistent with AWDis Operating Principles.

#### **LEGAL AND ETHICAL STANDARDS**

AWDis will require that all vendors and suppliers fully comply with all applicable legal and ethical standards and requirements of the countries in which they are doing business. AWDis will not do business with any vendors or suppliers who violate the legal and ethical rights of employees in any way.



B&C has signed up to the FWF's Code of Labour Practices, and thereby has committed to adhere to the labour standards in their own business operations.

The Fair Wear Foundation (FWF) exists to promote fair labour conditions in the garment industry worldwide and to supervise audits internationally.

The Fairwear Foundation verifies that the Code of Labour Practices is implemented and respected at the factories.

By becoming member of FWF, we committed ourselves to implementing and maintaining a Code of Conduct designed specifically for the garment industry. This Code of Conduct is based on the Conventions of the International Labour Organization and the Universal Declaration of Human Rights. This incorporates the following standards: No use of child labour, No use of forced labour, safe and healthy working conditions, legal labour contract, payment of a living wage, freedom of assiocation and the right to collective bargaining, no discrimination against employees, no excessive hours of work.









Beechfield Brands is firmly committed to offering good value products with industry leading quality standards however we will not let this be at the expense of any individual in the supply chain, nor with unacceptable environmental impact.

Suppliers undergo strict assessment, covering ethical policy, through ability to meet product quality and service standards. Beechfield Brands have established partnerships with a dedicated manufacturing base, thus ensuring consistency of quality and supply.

As part of this process we reference against the local laws in the respect of wages, health and safety, welfare and human rights. Beechfield Brands do not condone the use of any labour which has been forced or coerced and this includes child labour. Our field based staff carry out full audits to ensure that factories meet, or exceed, applicable local standards.

Beechfield Brands is committed to protecting the quality of the environment through sound environmental practice. Beechfield Brands ensure that factories meet or exceed local environmental laws and regulations in an effort to reduce waste and minimise the environmental impact of their operations.



As our industry continues to demand both quality and affordability, Bella recognise their responsibility to meet these demands by establishing strategic relationships which embody their fundamental values of integrity, honesty, and proper conduct amongst their workplace, customers, and distributors.

Bella believe it is their highest priority to provide workers with a safe working environment which practices excellent workplace standards and complies with all government health, safety, and labour regulations. Just as Bella are committed to producing only the highest quality garments, they also hold themselves to maintaining the highest ethical and conscientious standards for their workers and factory conditions.

In addition, Bella believes in living a healthy, balanced lifestyle while minimizing their impact on the environment. As a company, Bella are doing their part everyday by taking small steps that positively contribute to our environment. Bella continually implement green practices that include everything from printing on post-consumer recycled paper to utilising alternative energy sources in our workplace. Bella hope that you enjoy their clothing and join their effort to conserve, recycle and improve our world.

#### BROOK TAVERNER & wardrobes

#### **Environmental Policy**

Brook Taverner & Co Ltd endeavours to reduce our impact on the local and global environment and is committed to continual environmental improvement.

The company actively promotes the principle of sustainable development and confirms:

- We will meet and where possible exceed all relevant environmental legislation and introduce company standards where legislation does not already exist
- We seek to reduce the consumption of raw materials in all operations and endeavour to use recycled material where economically feasible
- We confirm that no AZO or other harmful dyestuffs are used in the production of the fabrics used in our collections. We endeavour to work to the principles of the Oekotex Standard 100 and 4 of our capsule collections currently meet this high industry standard
- We regulate the manufacturing processes of our suppliers to cause the least practicable impact on the environment and actively support renewable energy
- We liaise with suppliers and customers to evaluate and improve the company's environmental performance
- We liaise with authorities and technical organisations to evaluate and improve the company's environmental performance
- We periodically review the environmental objectives and targets of the company

#### **Ethical Policy**

Brook Taverner Ltd follows the labour standards recommended by the Fair Wear Foundation. The Labour standards are based on the Conventions of the International Labour Organisation and the Universal Declaration of Human Rights.

- 1. Employment is freely chosen
- 2. There is no discrimination in employment
- 3. No exploitation of child labour
- 4. Freedom of association and the right to collective bargaining
- 5. Payment of a living wage
- 6. No excessive working hours
- 7. No discrimination is practised
- 8. Decent working conditions
- 9. Regular employment must be provided
- 10. No Harsh or inhumane treatment is allowed
- 11. Fire safety



The environment and ethics have always been important issues for Craft and the company closely monitors the way in which suppliers treat their employees and their management of environmental issues.

#### DEMANDS ON THE SUPPLIERS - CODE OF CONDUCT

Craft considers showing respect for different countries' legal standards as well as international organisations'

view on basic rights as important for customers and suppliers. Craft must be responsible for its operations in Europe as well as in the rest of the world.

Craft make our ethical and moral points of view clear at all times, as we know that it effects our long-term development and business. Their Code of Conduct is applied on all factories involved in the production of Craft's products. At the same time as Craft are aware of the different legal and cultural conditions for factories at different locations, the Code of Conduct states the basic standards that all factories have to live up to if they want to do business with Craft. Code of Conduct is an agreement that Craft's suppliers have to enter into and follow. It says that the suppliers have to work according to the law and let Craft into their factories and data for regular controls. The Code of Conduct contains items like no discrimination, no child labour, salary and working hours, working conditions and the freedom to join unions.

#### THE ENVIRONMENT

Craft works closely with its suppliers when it comes to environmental respect and the Code of Conduct mentioned above contains standards about chemical restrictions made up by Sweden's textile importers' chemical guide that suppliers have to follow.

Craft's suppliers must make sure that their suppliers strive to decrease the use of virgin raw material, the discharge of "unnatural" material, waste, air pollution as well as the consumption of energy and fresh water. Apart from Sweden, Craft has established purchase offices in China, Bangladesh and Vietnam. At these purchase offices, employees that make sure that suppliers live up to Craft's demands when it comes to quality and environment, work. Craft sends samples from the production to independent institutions. like IFP Research and SGS, to make sure that the products do not contain any forbidden material. Craft makes continuous efforts towards environmental improvements in its ordinary production. The Group has previously phased out most of the use of chlorine bleaching in favour of bleaching using hydrogen peroxide. Craft invests considerable resources in ensuring that certain carcinogenic AZO dves are not used. Suppliers have also been encouraged to use mechanical shrinking instead of chemical shape stabilisation, in order to avoid formaldehyde residue that may induce allergies. Craft organises transports from the Far East between different companies as much as possible. Craft is currently investigating the possibility of transports with trains instead of lorries in Bangladesh. Craft hardly uses airplane deliveries at all, unless the delivery is very urgent.

#### WORKING CONDITIONS

For Craft the working environment and the way in which employees are treated at the suppliers' plants are most definitely included in the term environment.

Craft's personnel perform continuous checks to ensure, for example, that no products are made by child workers. Craft's suppliers have signed an agreement giving a guarantee that no children are employed in the production process, in accordance with the United Nations' Convention on Riights of the Child1. The purchasers and our purchase department make active efforts to ensure satisfactory working conditions in the factories with which Craft conducts business. In several cases, the Group has donated various kinds of protective equipment to factories in developing countries. Although Craft makes extensive checks, it is difficult to guarantee that no child labour is used and that working conditions are always satisfactory. At unannounced visits, Craft sometimes uses physicians to make sure that no children are working in the production.

#### ETHICS

Craft also wants to play an active role in building a better society for those working in the production plants where the Group's collections are produced. An example of this is the Craft School, an education program for more than 250 children in Jue Xi in southern China. In Finland, Craft cooperates with Unicef, by donating some of its sales income from certain products to the organisation.



Williamson-Dickie Europe Ltd strives to apply high social and ethical standards throughout their business and supply chain. The Company seeks to protect the health, safety and welfare of all personnel involved in producing Dickies

products worldwide. This is done by enforcing a strict Code of Conduct, and conducting regular factory audits.

The Company looks to work with business partners who share our social and ethical standards and goals. Williamson-Dickie Europe Ltd are proud to operate within the global group of Dickies affiliate companies, and to continue their reputation for conducting business in a fair and ethical manner.



#### CODE OF CONDUCT

Fruit Of The Loom (FOL) is committed to conducting our business in accordance with the highest standard of business ethics and human rights. We appreciate that other countries have different cultural, legal and ethical systems. However, the fruit code states that any facilities we usemust always satisfy certain basic requirements.

#### COMPLIANCE WITH LAW

FOL requires that all manufacturing facilities operate in conformance with the requirements of applicable law.

#### **HEALTH AND SAFETY**

Conditions throughout the facilities must be safe, clean and meet or exceed requirements of all applicable laws and regulations regarding health and safety.

Workers must also be trained and equipped to perform their jobs safely.

#### CHILD LABOUR

No person shall be employed at an age younger than the age for completing compulsory schooling in the country of manufacture, or the age consistent with International Labour Organisation guidelines, whichever is greater.

All FOL authorised facilities must observe legal requirements for work of all employees, particularly those pertaining to hours of work and working conditions.

#### FORCED LABOUR

The use of forced or compulsory, indentured, or bonded labour is prohibited.

#### HARASSMENT OR ABUSE

Corporal punishment or other forms of harassment, abuse or coercion, whether mental or physical, are strictly forbidden.

#### DISCRIMINATION

Discrimination in hiring, pay, promotions, discipline, termination or other terms and conditions of employment based on personal characteristics, beliefs or other legally protected criteria, is prohibited.

#### WORKING HOURS

Except in extraordinary business circumstances, employees shall (i) not be required to work more than the lesser of

- (a) 48 hours per week and 12 hours overtime or
- (b) the limits on regular and overtime hours allowed by the law of the country of manufacture, and (ii) be entitled to at least one day off in every seven-day period.

#### **WAGES AND BENEFITS**

FOL requires that employees be fairly compensated by providing wages, including overtime pay, and benefits that meet or exceed all applicable laws and regulations.

#### FREEDOM OF ASSOCIATION

FOL recognises and respects the rights of employees to freedom of association and collective bargaining.

#### **ENVIRONMENTAL COMPLIANCE**

FOL requires compliance with all local laws protecting the environment. In addition, business should be conducted in a manner that minimises all waste and maximises recycling, and which results in proper storage and disposal of hazardous substances.

#### CUSTOMS COMPLIANCE

FOL will comply with all applicable customs laws and establish and maintain programmes to safeguard against the illegal transshipment of products.

#### SECURITY

FOL will maintain security procedures to guard against the introduction of non-manifested cargo (drugs and other contraband) into shipments of our products.

#### NOTICE AND RECORD KEEPING

This Code of Conduct must be posted in a location accessible to all employees and visitors (in the appropriate language).

#### **ENFORCEMENT**

FOL employs internal, as well as third party auditors, to ensure compliance with this code at all locations conducting business for FOL. FOL maintains detailed records of all facilities to determine compliance with this policy.

## GILDAN

Gildan is dedicated to being a socially responsible employer in all geographical hubs. Gildan are committed to investing in modern, state-of-the-art facilities and to adhering to progressive employment practices.

#### Gildan's donation policy

When determining the corporate donation policy at the beginning of 2005, Gildan decided to focus on humanitarian aid as well as youth and education in communities in which the Company operates. This policy allows Gildan to contribute to employee and community development. During the year, Gildan supported different causes in the countries where it operates.

#### Gildan develops environmental management plan

Gildan implemented an Environmental Code of Practice (ECP) in 2003, which details requirements for materials to be used in manufacturing. This ECP, in place at Gildan-owned facilities and its suppliers, allows the Company to ensure that none of the materials used in the production process contain substances harmful to the environment. In 2006, to further enhance environmental, health and safety practices, Gildan developed an environmental management system (EMS) plan that was implemented company-wide during 2007. This EMS covers all activities and services performed and all products manufactured on Gildan premises.

# **GLENMUIR**

# 1891

Glenmuir believes in promoting an atmosphere of mutual trust, honesty and integrity between customers, associates and suppliers. Glenmuir strives to achieve the highest possible standards in all working practices and expect their business partners to do the same. Glenmuir seeks partners who share their commitment to the promotion of best practices and continuous improvement.

Glenmuir is guided by this code of conduct and requires that their business partners adhere to these principals. Before accepting a manufacturer as a new supplier they must demonstrate commitment to these principals by signing and returning a Manufacturer's Agreement.



Today's business environment demands that we deliver better products at competitive prices. It also demands that we act ethically and responsibly. It is essential that we conduct ourselves with integrity and comply with the laws and regulations that govern our global business activities. We have a responsibility to:

Ourselves - Our employees - Our Consumers - Our Business Partners

#### **OUR COMMUNITIES**

Hanes asks the same responsibilities from its suppliers. Hanes believes in doing business with those suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants who embrace and demonstrate high standards of ethical business behaviour.

#### OURSELVES

We want to be proud of the work we do and the lives we lead. Integrity is at the heart of who we are. Each Hanes employee is responsible for demonstrating integrity. Business integrity is hard to define, but everybody knows it when they see it. Among other things, it means honesty and obeying the law. It means treating those with whom we work with fairness and respect. And it means being accountable and taking responsibility for actions and consequences.

#### **OUR EMPLOYEES**

Our success as a company and as individuals depends on the unique contributions of all the people we work with. We owe each other honesty, respect, and fair treatment.

Human Rights and the Law: Hanes complies with employment laws in every country in which it operates, and supports fundamental human rights for all people.

- We will not employ children or forced labor, including prison or bonded labor.
- · We will not tolerate physical punishment or abuse.
- We will respect the right of employees to exercise their lawful right of free association.
- Similarly, we will recognise the lawful rights of our employees to choose or not choose collective bargaining representation.

Hanes enthusiastically supports laws prohibiting discrimination based on a person's race, color, gender, national origin, age, religion, disability, veteran status, marital status, sexual orientation or other protected characteristics.

#### **FAIR TREATMENT**

Hanes is firmly committed to the fair treatment and compensation of employees. All applicants and employees are judged by their qualifications, demonstrated skills and achievements.

#### DIVERSITY

We believe that differences should be valued. Every employee deserves the opportunity to work and grow in an environment that is free of discrimination and harassment, and that supports work/life flexibility.

#### HARASSMENT

Hanes employees have the right to work in an environment that is free from intimidation, harassment and abuse.

#### SAFETY AND HEALTH

Hanes is committed to providing a safe and healthy work environment.

#### OUR CONSUMERS

Consumers around the world purchase our products because they trust them. They trust their quality, they trust their value, and they trust that we will stand behind what we sell. Hanes wants to preserve that trust.

#### PRODUCT SAFETY

Hanes has a fundamental responsibility to ensure that consumers can trust the safety of our products. We have an obligation to monitor the quality of our supply chain to ensure that the products we sell meet all qovernment safety and quality standards, as well as our own.

#### **QUALITY AND VALUE**

Hanes builds preeminent brands by offering high quality and good value. No product can leave a warehouse or factory as first quality unless it is.

#### **OUR BUSINESS PARTNERS**

We depend on strong relationships with our customers, suppliers and other business partners who help us provide the high quality, high value products consumers demand. Hanes believes in doing business with those suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants who embrace and demonstrate high standards of ethical business behavior.

#### **OUR COMMUNITIES**

We actively seek opportunities to contribute to the communities in which we do business, and to improve the environment that sustains us all.

#### THE LAW

The first and foremost obligation of responsible citizenship is to obey the laws of the countries and communities in which Hanes does husiness

#### COMMUNITY COMMITMENT

Hanes is proud of its contribution to the economic and social development of the locations where it has operations.

#### ENVIRONMENT

Hanes is committed to protecting the quality of the environment around the world through sound environmental management. Hanes strives to continuously improve our environmental performance through resource conservation, waste minimization, water and energy efficiency and effective use of raw materials.

#### INDIVIDUAL POLITICAL ACTIVITIES

Hanes respects the right of each of its employees to participate in the political process and to engage in political activities of his or her choosing.



We fully recognise the importance of the people and the countries where we manufacture and require that any manufacturer or supplier associated with us share our commitment to fair and safe working practices.

All our manufacturing locations are inspected every day by our local representatives ensuring that working conditions are to the very highest standard, and that the working hours are within local government criteria – with no child or forced labour.

Henbury Ltd, have a strict set of guidelines for our suppliers.

- All of our factories (must) operate in full compliance of their country relating to all applicable laws, rules and regulations - including labour, worker health, safety and the environment.
- All workers must be treated with respect and dignity and must not be subject to physical, verbal, sexual or psychological harassment in connection with their employment\*
- All suppliers and factories must adhere to the all applicable labour laws including those related to hiring, wages, hours worked, overtime and working conditions\*
- Workers must be free to join and organise any unions or associations of their own choosing. Where local laws limit the right of freedom of association, employers shall not obstruct alternative and legal means of free association.
- There will be no use of forced labour





It is the policy of Kariban to only purchase goods from Suppliers and contractors whose Code of Practice on Health & Safety are as follows:

- They adhere to AZO Legislation, Oeko-Tex Standard 100 Requirements and Environmental issues.
- They observe the Laws of the Land at all times and show a willingness to emulate the Kariban Standards of Business Integrity & Ethics.
- They do not use or condone the use of any labour which has been forced or coerced and this includes prison labour as well as child labour. Child Labour is defined by and complies with local regulations. They do not allow the use of corporal punishment or any type of physical torture as a means of disciplinary action.
- They subscribe to the payment of proper and legal wages and benefits. The working hours should not exceed the local allowance for overtime and they should encourage one day ins even as a holiday in accordance with or subject to local practices.
- They should not expect Kariban support or participate in any local, regional or national war or armed conflict and understand that Kariban will seek to minimise such risks.



Kooga Standards are written in line with the Kooga Code of Conduct, which will ensure that quality workplace conditions are maintained. Factories are responsible for compliance with applicable laws and regulations, however, these Standards may in some cases provide for more stringent regulation of workplace conditions.

It is the intention of Kooga that all factories apply the local law as the MINIMUM standard and in some cases this will be equivalent or better than this code

Factories that wish to outsource or subcontract work on our products must obtain prior authorization for outsourcing or subcontracting from us. Complete information about the subcontractor should be provided in a timely manner. Subcontractors are expected to comply with our Standards

These guidelines translate our Standards into operational language for employees and factory managers to assist in preparing factory for compliance. Each Standard is divided into subsections with explanatory text that clarifies the detail behind the topic.

In assessing workplace conditions, it is important to recognise that direct interviews with workers are an essential component of monitoring. Interviews are best conducted by local nationals speaking in the local language away from production lines.

To achieve implementation of this policy, Kooga require that suppliers allow full knowledge and access of the production facilities used.

An essential part of achieving factory compliance with these Standards is education. All factory managers and supervisors should receive training in the Standards. Kooga recommend that all workers, as part of their induction are informed about their rights and obligations as defined by this code and applicable labour laws.

Factories producing Kooga products will publicise and enforce a non-retaliation policy that permits factory workers to speak with staff without fear of retaliation by factory management.

Kooga object strongly to the use of force to suppress any of their Standards and will take any such actions into account when evaluating factory compliance.

Factories producing Kooga goods must post the Code of Conduct in all units, translated into the language of the worker.

## KUSTOM KIT. GAMEGEAR.







At Kustom Kit we have never purchased from a supplier we haven't inspected and approved personally. In fact, we have state-of-the-art overseas offices where the sole focus of our own local staff is to assure total compliance of our strict ethical standards for suppliers and to test fabric and finished garments at source.

We've dedicated the last 40 years to making the best clothing we can, both in the UK and overseas. Our clothing is crafted to give outstanding service and our experience in ethical sourcing ensures you can have total confidence in our brands.

We believe that business should be conducted with total respect for people and the environment. We adopt a rigorous selection process for garment manufacturers, ensuring only those that are totally committed to exceeding our high ethical standards become appointed suppliers.

#### **OUR ENVIRONMENTAL POLICY**

We recognise that our business activities affect the natural environment in a number of ways. We strive through continuing improvement to minimise the adverse effects on the environment and the earth's natural resources, whilst safeguarding the health & safety of our employees and the public. We purposely seek out suppliers who take positive action to minimise both waste and the impact of their manufacturing processes on the surrounding environment.

We aim to always:

- Comply with or exceed relevant legislative requirements. Where
  these are inadequate we will set our own standards that comply with
  our environmental and ethical criteria.
- Encourage manufacturing suppliers to recognise their environmental responsibilities and offer support to help them implement sound environmental health & safety policies and practices.
- Design and manufacture our products with consideration for the environment.
- Reduce progressively the environmental impact caused by our products and activities.

#### **OUR STANDARDS FOR SUPPLIERS**

Our products are manufactured by different supplier organisations employing thousands of people in many countries. We recognise and honour our duty to protect the workforce used in the manufacture of our garments and work tirelessly with our suppliers to ensure the provision of fair wages and working hours, safe and hygienic working conditions, regular employment and no discrimination or harsh or inhumane treatment of employees.

Each appointed supplier must comply with national and other applicable laws and conform to the following terms as a minimum requirement;

- Children must not be employed below the legal minimum age required by the law of the individual country.
- Employees are to be paid no less than the legal minimum wage as required by the law of the individual country and maternity leave must be made available to all female employees.
- Working hours must not exceed those set out by local legislation and overtime must be voluntary and always paid at a premium rate.
- Employment is freely chosen and no discrimination is practiced.
   There is no use of forced or involuntary labour and employees are free to leave their employment after reasonable notice.
- Good working conditions must prevail. The provision of adequate wash room facilities and a canteen are essential.
- · Primary medical care must be provided on site.
- Workers' representatives are not discriminated against and are allowed access to the workplace to carry out their representative functions.

# maddins<sup>®</sup>

Maddins believe the customer should be able to trust the clothes they have bought have been created under reputable circumstances. Maddins follow a policy that underlines the commitment to integrity of all our business practices.

Maddins are conscious of the impact on the environment from our industry, and as such looks to minimise the effect that our operations have.

Maddins only work with partners who have the same beliefs as we do, and follow guidelines on forced and child labour, harassment or abuse, non-discrimination, health & safety, freedom of association and collective bargaining, wages and benefits, hours of work and overtime compensation.



#### Madeira Resource Management

Through the media, we are all aware that every single one of us has accountability for the environment and the legacy of our actions or lack of them

Madeira's beautiful and exclusive threads harmonize style, quality and colour with all environmental and ethical needs. Almost 100 years of experience in producing the most consistent high quality, fashionable and widest range of embroidery threads, means Madeira threads are the choice of leading brands worldwide.

Applied onto wide and varied items from shoes to hats, toys to towels and across diverse industries from fashion and sportswear to automotives – critical from the outset is the selection of only the best raw materials.

#### REACH & MADEIRA EnviroSystem

REACH = Registration, Evaluation, Authorisation and Chemical Restriction. Even prior to REACH, Madeira subscribed to the philosophy of only using substances which were neither hazardous nor dangerous to people or the valuable eco-system. No APO/APE softeners (Alkyl Phenol Oethoxylates/Ethoxylates), which are found in some threads, are used to finish Madeira's threads. All meaning that, following supplier's recommendations, Madeira's dyestuffs are non-toxic to workers, the environment and the end user — before, during and after production.

Created with sensitive production processes in the heart of the naturally environmentally conscious 'Black Forest', Madeira's EnviroSystem applies long term commitment to the global impact of environmental issues, second to none.



TheMagicTouch (G.B.) Limited was formed in 1992 to manufacture and distribute a range of transfer papers and associated products for the image transfer process.

The company has always adopted a strong commitment to ensure that all suppliers support a high ethical and health and safety standards in all practices.

The transfer papers are produced in the UK, Germany and Japan where all operators are highly skilled to ensure consistent quality control on all products. All employees involved in production are paid well in excess of the respective countries minimum wages. At no stage in either the production or distribution of the transfer papers is there any involvement of child or forced labour.

TheMagicTouch transfer papers do not involve the use of any toxic or solvent based products helping to reduce the impact on the environment.



Portwest make sure that all garments supplied by Portwest are manufactured to the best ethical, social, health and safety standard. We achieve our aims by

- Working in countries, which have good labour laws. All our garments are manufactured in China. The government of China do not permit child labour. Child labour is a common practice in India, Pakistan, Thailand and others. China recently introduced new labour laws, which insures workers are paid each week, get sick pay and other social benefits.
- 2. We are working closely with partner factories to achieve the WRAP certified standard. (http://www.wrapapparel.org/). WRAP is an independent, non-profit organisation dedicated to the certification of lawful, humane and ethical manufacturing throughout the world in the apparel industries. Our main partner factory, which supplies over 45% of all our garments, recently achieved this standard. We are working closely with other factories to achieve this standard which we expect most of them to achieve before the end of 2008.
- 3. Portwest have a fully staffed office in China and also maintain full time staff in our three biggest partner factories. All are staff are briefed to inspect the factories they work with, work closely with the staff and to meet management each month on ethical and social issues.
- 4. Portwest staff from UK and Ireland visits the factories twice each year and again progress toward achieving WRAP certification is monitored. Partner factories know the deadline to achieve this standard is the end of 2008.



Premier Clothing Ltd ("Premier") strives to conduct business to the highest ethical and environmental standards, seeking to use and utilise manufacturers that do the same. Premier has its own detailed code of conduct, which is integral to its business and that all suppliers and their sources must adhere to. Premier's code of conduct is based on current best practices with regard to employment ethics, health and safety practices and environmental practices; so that when a customer purchases Premier goods they know that they have been produced under acceptable conditions. That means that the goods must have been produced:

- · lawfully, through fair and honest dealing;
- · without exploiting the people who made them;
- in decent working conditions;
- reducing the environmental impact during production and transportation



### **CRAGHOPPERS**

#### 1 ETHICAL TRADING POLICY

The Ethical Trading Policy process comprises three parts: -

#### 1.1 LETTERS

This comprises an introduction/commitment letter to Ethical Trading, a Child Labour Zero Tolerance Letter and a AZO dye Letter and PFOS fabric protector letter.

#### 1.2 VISUAL FACTORY EVALUATION

A visual factory evaluation containing critical/zero tolerance sections such as child labour, health and safety and working conditions.

#### 1.3 QUESTIONNAIRE/INTERVIEW

A detailed questionnaire/interview with managers and workers that investigates further the above critical issues and includes questions on management systems in place, working hours, wages and security.

The Regatta Group Ethical Trading Policy is communicated to all suppliers and we as a company are responsible for ensuring that suppliers understand the code and the importance of the system, prior to accepting orders.

#### 2 THIRD PARTY AUDITS

In addition to our own Ethical Trading policy, we also use a recognised third party organisation that carries out strict ethical inspections. This organisation is a recognised leader in its field and an ANSI/ASQ National Accreditation Board (ANAB) accredited international provider of quality management system registrations to the ISO 9001:2000 and AS 9100 standards. The third party audits are arranged in 3 stages:

#### 2.1 TRAINING

Each factory is given training prior to the inspection in order to help them understand the audit requirements and prepare the necessary documentation.

#### 2.2 AUDIT

During the audit the factory is scored on a point's basis per section. The total point structure for the audit is as follows: -

Outstanding - 95% Excellent - 90%-94%

Very Good - 85%-89% Average - 70% - 79%

Needs Improvement 61%-69% Not Recommended - 60% and below

#### 1 ETHICAL TRADING POLICY

N.B. Anything from 70% and above we class as a pass/compliant, but will work with the factory on all improvements and recommendations suggested.

#### 2.3 ACTION PLAN

Following the audit, an action plan will be sent to each facility inspected. We will then work with each factory to help them achieve full compliancy. Each month we target the supplier to achieve the next

point bracket. This is monitored by regular visits to Asia both from the UK and our Far East office.

#### 3 ETHICAL TRADING CODE

#### 3.1 CHILD LABOUR - ZERO TOLERANCE

Child labour is not tolerated by The Regatta Group. It is essential that no children younger than the minimum age established by law or under an age interfering with compulsory schooling shall be employed. Each worker is required to provide an ID card or proof of age documents before employment commences.

In the event that child labour is found, the supplier must immediately react with due consideration for the care of the children. No new recruitment of children shall occur. Further breaches will prevent The Regatta Group from continuing to work with the factory.

Young persons under the age of 18 shall not be employed at night or in hazardous conditions.

#### 3.2 EMPLOYMENT AND DISCIPLINE

The Regatta Group does not condone and will not be party to any form of forced or involuntary labour. All employees must attend work voluntarily.

Any requests for employees to lodge "deposits" or identity papers are strictly forbidden. Workers are free to leave their employers after reasonable amount of notice.

Any sort of disciplinary measures must be recorded. Deduction of wages as a disciplinary measure is not permitted.

#### 3.3 HARASSMENT AND ABUSE/DISCRIMINATION

The work environment shall be free from abuse, harassment, intimidation or physical punishment of any sort. The Regatta Group and our third party organisation carry out interviews with workers in confidence to ensure there are no cases of bullying, abuse and discrimination based on nationality, race, religion, gender, age, personal characteristics or beliefs.

Employees are hired, paid and promoted based on their ability to do the job. If the employee cannot fulfil their duties satisfactory it will be at the discretion of the employer to terminate the contract.

#### 3.4 HEALTH AND SAFETY

It is the responsibility of the employer to ensure the provision of a safe and hygienic working environment, including safe housing where appropriate

Health & Safety critical points are a major part of The Regatta Group initial visual factory evaluation (part 2) and only upon completion of all points and compliance, will The Regatta Group start working with the factory. Some of our critical points include; child labour, exits unblocked/unlocked, exits leading to place of safety, availability of fire extinguishers and other fire fighting equipment, sufficient aisle space which is free of obstruction and have clear markings, appropriate and adequate amount of first aid equipment provided.

It is also a condition that employees will be provided with safety equipment and sufficient safety training.

Unrestricted access to clean sanitary facilities and potable water shall be provided.

#### 3.5 WORKING HOURS AND REMUNERATION

Total working hours will not exceed the maximum legal limits. All overtime shall be voluntary and workers will be paid overtime in accordance with national law.

Wages must be at least the minimum required by local law, including allowances and benefits.

All workers must receive a clear contract, a letter of employment or other verifiable statement, setting out the terms and conditions of employment, including working hours and rate of pay.



Environmental considerations are an integral part of Result's business practice. Four areas of particular attention are product design, responsible manufacturing, energy efficiency and recycling. From the earliest stages of product design through manufacturing, use and recycling, we take care to keep our activities and our products environmentally sound.

Being responsible for our impact on the environment, Environmental practices: RESULT demands all suppliers pursue correct environmental practices, including the recycling of waste materials and the recirculation of waste heat generated in the dveing process. Result insists on the use of azo-free dyed fabric & recycled polybags; and other recycled materials where possible. Recycling: As innovations to fabric recycling evolve. Result reserve the right to make running changes to any relevant styles where recycling can enhance performance or lessen environmental impact.

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#### REACH BANNED SUBSTANCES

RESULT actively encourages all suppliers to have full compliance with REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) and ensure no harmful chemicals - to any human or environment - are used in products bearing the Result brand. Draft list available on application.

Nickel: Garments are tested to ensure all trims are nickel-free.

#### **OEKO-TEX STANDARD 100**

With its comprehensive list of criteria, the Oeko-Tex Standard 100 label gives the industry and consumers the confidence they need in seeking assurance that those RESULT textiles listed have been tested against the use of harmful substances

#### COMPANY POLICIES

#### CORPORATE RESPONSIBILITIES

Corporate responsibility At RESULT we see corporate responsibility as key in how we conduct our business and believe it makes good sense by running our business in a responsible way with regards: Minimum age labour. RESULT does not permit the employ of workers under the minimum age established by local law or below compulsory school-going age, whichever is greater. In no case shall Result permit the employ of individuals under the age of 16. Working Conditions. RESULT requires that all authorised garments bearing its name be manufactured under conditions which adhere to strict standards on working hours and good working conditions, including factory temperature. RESULT requires all suppliers to employ based on equal opportunity and non-racist policies. Developing healthy links with the communities in which we operate both within the UK and overseas by creating opportunity, skill development and support in emerging economies. Delivering value to our customers with the Result guarantee of excellence. Result products carry a fair wear and tear guarantee and Result will gladly repair, replace or refund any garment which has a genuine manufacturing fault. When a garment is accepted back for our quick turnaround repair service, Result respectfully asks customers to ensure this garment is clean, particularly when the garment has been in contact with animals or chemicals. Result reserves the right to not handle or repair any garment which it feels would compromise the health and safety of its operatives

#### PURCHASER RESPONSIBILITY

All RESULT products are designed to be decorated and all statements, technical information and recommendations herein are based on tests we believe to be reliable, but the accuracy or completeness thereof is not guaranteed. Before use, the user must determine the suitability of the product for its intended use, as the user assumes all risk and liability whatsoever on connection therewith.

Colour Reproduction: RESULT designers take great care with garment colour. Limitations of media print may mean slight shade variations

with images. Pantone references are supplied for guidance only.

Product Responsibility: Every reasonable care has been taken to ensure that the descriptions are accurate, however specifications may change. All garments are protected by copyright owned by RESULT Clothing Limited and their reproduction in any form without the express consent of the copyright holder will be actioned under copyright law. Sizes: Garment Sizes: UK sizes - imperial. Euro sizes - metric. Junior sizes: age and height La Femme sizes: UK ladies fit 8-18 Garment sizes indicated are approximate body fit sizes and for guidance only. All styles subject to availability.









RTY will only do business with vendors and suppliers that share the company's adherence to high legal, ethical and moral standards. RTY's goal is to create and encourage creation of model operations that provide good jobs at fair wages and also improve conditions in their communities

All suppliers, vendors and other business partners are expected to comply with RTY Operating Principles and to assure compliance in all contracting, subcontracting or other relationships. In establishing these guidelines, RTY believes it is effectively exercising its economic leverage with business partners to encourage their full compliance with laws designed to protect their employees and support the highest standards of business conduct.

The following guidelines have been developed to ensure consistent compliance by all suppliers and vendors. RTY recognises that the Guidelines will also assist management in selecting business partners and follow work place standards and practices consistent with RTY Operating Principles.

#### SELECTION GUIDELINES LEGAL AND ETHICAL STANDARDS

RTY will require that all vendors and suppliers fully comply with all applicable legal and ethical standards and requirements of the countries in which they are doing business. RTY will not do business with any vendors or suppliers who violate the legal and ethical rights of employees in any way.



PF Concept places the utmost priority on ensuring compliance with all laws, regulations and social responsibilities; consistently abiding by our own high business ethics and that this should be the foundation of all of our business activities. We firmly believe that observing laws regulations and social standards is a primary requisite of any international company of quality and essential in winning and maintaining the trust of both our customers and employees. We are therefore committed to ensuring our products and services are in compliance of all relevant EU product, safety, health and environmental regulations.

Our corporate team of 120 quality professionals; comprising quality engineers and QC inspectors in addition to social and environmental compliance auditors, all combine to assist us in managing and controlling our companies' social, product, safety, health and environmental responsibilities. We partner with independent, certified test laboratories to conduct all required product compliance testing. In addition we also operate our own in-house testing facilities which include, among many others, Cadmium and ROHS test equipment, in order to reinforce this process and ensure compliance with all applicable laws. We carry out, on a regular and systematic basis; not only Social Compliance Audits, but also Environmental Compliance Audits (based upon EMS – ISO 14001 standards).

In order to contribute to overall global environment protection, within our markets, PF Concept places a high priority on initiatives that foster environmental protection and the encouragement of high health and safety standards.

We take pride in the quality of our work, the professionalism we bring to the market and the robustness of our values and practices! The Core Values of PF Concept have been detailed below and define the values and standards by which PF Concept conducts their business. They also remind all PF Concept employees of their responsibilities to behave in such a way as to recognize and meet the challenges we daily face as true professionals in the modern global business environment:

- Commitment to full compliance with EU product, safety, health, & environmental laws.
- Development and implementation of prudent ethical practices, within our global facilities, that will often go beyond common regulatory compliance.
- As we operate across the world we must recognise the values and global diversity within both our employees and customers.
- · We respect the Individual
- We are Open and Honest in our Communication
- Comprehensive industry leadership in policy, procedures and operational audits across all company facilities (PF HK is ISO 9001 certified).
- · Commitment to continual improvement.
- Proactively seeking new information and training in order to create, initiate and advance new ideas and approaches to manage ethical and environmental exposures in advance of mandated regulations.



#### **OurWorld Production Code**

STORMTECH realise that we need to take responsibility for our world. Not only do they comply with all applicable environmental regulations and laws in the countries of production, but have gone a step further to create their own ethical production code.

The STORMTECH OurWorld Production Code ensures that no materials used in the production of STORMTECH gear contain any substances that are harmful to the environment.

Requirements are detailed for production facilities in the areas of air, water, and noise pollution, as well as recycling in order to minimize the impact they have on their surroundings.

Every production facility used by STORMTECH provides their consent to upholding this code. Before doing business with any third party manufacturer STORMTECH visit their facility to see first-hand if they can meet their environmental standards. The requirements of this code illustrates their support of the International Standard

Organisation's 14000 series of environmental standards, as well as other key international environmental initiatives.

STORMTECH are committed to protecting our world and conserving its natural resources. It's a healthy choice for the planet, and for the consumer who wears STORMTECH Performance Apparel.



#### **OUR COMMITMENT:**

At SDL Group Limited we are committed to managing our operations and services in a way that is environmentally sustainable and economically feasible.

As a responsible organisation we will endeavour to comply with all applicable environmental legal and other requirements that apply to our activities, products and services.

We are committed to the implementation, maintenance and enhancement of the SDL Group Environmental Management System in order to deliver continual improvement in our environmental performance.

#### POLICY SCOPE:

This policy applies to all activities of the SDL Group Limited incorporating the trading brands of 'Surridge Sport', 'Incentives UK' and 'SDL Trophies'.

#### OUR OBJECTIVES:

SDL Group Limited, subject to sound business practice and economic practicality, is committed to achieving the following environmental objectives:

- Identifying and reducing waste streams arising from our operations and disposing of waste in a way that minimises harm to the environment
- · Reducing consumption of fuel, water and energy wherever possible.
- Provide awareness training and where required job specific training for employees on environmental issues.
- Encourage suppliers and subcontractors to introduce programmes which support our environmental objectives and targets, where their activities have a significant impact on the environment.
- Source and promote a product range to minimise the environmental impact of both production and distribution.
- Meet or exceed all the environmental legislation that relates to the Company.
- · Setting, monitoring and reviewing our environmental targets.
- · Considering environmental issues when making new investments.

#### POLICY CONTROL AND REVIEW:

The SDL Environmental Management System will be reviewed at least annually and revised taking into consideration any legal changes, improvements in technology or the needs of the company.



Wombat is continuing to develop its environment practices in the production of the garments, the choice of fabrics used and the Wombat working environment. Key examples of these procedures are:

#### **Garment production**

- All companies comply with the EU general Product safety Directive 2001/95/EC.
- Wombat is working towards all suppliers complying with the requirements of the Azo dye directive and Nickel directives meaning that no dangerous substances and preparations are used during the make up of any of its garments.
- Wombat is constantly working to minimise the waste fabric during production operations.

#### **Fabrics**

- A selection of the range now carries the FAIRTRADE mark.
   This the only independent consumer label that guarantees a better deal for the producers in developing countries
- All Wombat products are 100% cotton (except one which contains a little elastane).

#### Head Office recycling

- Toner cartridges from laser printers are returned to the manufacturer for recycling.
- All cardboard waste from the warehouse is recycled.
- Wombat is working towards all their plastic bags carrying recyclable logos.
- Use of environmentally friendly office consumables where possible.
- Collection point for office staff to recycle paper.
- Email is the preferred method of communication to reduce the amount of paper used.

Wombat's long term goals are to produce all packaging in recycled and degradable materials and to continue work and support with the Fairtrade foundation.