

## CODE OF CONDUCT

- The Warehouse Code of Conduct sets out our policy on supply chain labour and environmental standards and is based on the Ethical Trading Initiative's (ETI) Base Code. We believe all workers must be treated with dignity, respect and fairness and that the environment must not be harmed in the manufacture of our products.
- Our customers expect working conditions in our supply chain to conform to international labour standards. Where this is not the case, our brands face reputational risks. These risks can affect our suppliers too and therefore it is also in the interest of our suppliers to uphold the standards in this Code.
- We believe the Code can only be implemented by working in partnership with our suppliers. This partnership must be based on trust, transparency and co-operation. By this we mean that suppliers must be open with us about labour and environmental conditions in order that we can jointly resolve any areas that do not meet the standards in our Code.
- Warehouse recognises that in some cases it may not be possible to immediately comply with the Code because of complex and multiple barriers. Where this is the case, suppliers must commit to making continuous improvements towards the Code over a reasonable timeframe. Suppliers will be expected to implement a corrective action plan to remedy any non-compliances with the Code. This must be agreed with Warehouse's staff or representatives.
- Our staff or representatives may visit your manufacturing sites to ensure that working conditions meet the standards of the Code. Suppliers will be advised of these visits in advance but we reserve the right to make unannounced visits too. Suppliers must provide our staff or representatives unrestricted access to all facilities, including dormitories, and must provide full access to all relevant documents and records.
- Each supplier must nominate a member of senior management to be their point of contact on any matters that may arise regarding compliance with our Code. Suppliers must communicate the Code to all their workers and ensure their suppliers meet the standards of the Code.
- The provisions of this Code constitute minimum and not maximum standards, and this Code should not be used to prevent suppliers from exceeding these standards. Suppliers are expected to comply with national and other applicable law and, where the provisions of law and the Code address the same subject, to apply that provision which affords the greater protection to workers.

Warehouse's Code of Conduct applies to all workers, including agency, migrant, temporary and permanent workers.

1. EMPLOYMENT IS FREELY CHOSEN

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers representatives' are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. CHILD LABOUR SHALL NOT BE USED

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous

conditions.

- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. LIVING WAGES ARE PAID

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. WORKING HOURS ARE NOT EXCESSIVE

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.\*
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all of the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay
- 6.4 The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:
- This is allowed by national law
  - This is allowed by collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce
  - Appropriate safeguards are taken to protect the workers' health and safety, and
  - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies
- 6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, 2 days off in every 14 day period.

\* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

7. NO DISCRIMINATION IS PRACTISED

- 7.1 There is no discrimination in hiring, compensation, access to training, promotion,

termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. REGULAR EMPLOYMENT IS PROVIDED

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. NO HARSH OR INHUMANE TREATMENT IS ALLOWED

- 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

10. ENVIRONMENTAL PROTECTION

- 10.1 Suppliers must manage all resources and waste in accordance with local laws or in such a way as to avoid harm to the local population.