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# 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:



#### Ethical Trading Initiative Respect for workers worldwide

#### 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 Mumbles Okarma Splashmacs

Tombo Tombo Teamwear 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.

#### Brands

Adidas	Gildan
Boxercraft	Hanes
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 Premier



#### Oeko - Tex 100 Standard

#### www.oeko-tex.com

The testing and certification system of the Oeko-Tex<sup>®</sup> 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 Brook Taverner Fruit of the Loom Gildan Hanes Jerzees Schoolgear Kariban
- Kariban Spaso Kariban Sport Madeira Okarma Quadra Result Russell



#### 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 Front Row Fruit of the Loom Gildan Hanes Jerzees Schoolgear Just Cool by AWDis Just Cool by AWDis Just Sub by AWDis Mumbles Okarma Result Core Result Winter Russell Splashmacs Spiro Tombo Tombo Tombo Teamwear 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



#### REACH

REACH is the European Community Regulation on chemicals and their safe use (EC 1907/2006). It deals with the Registration, Evaluation, Authorisation and Restriction of Chemical substances. The law entered into force on 1 June 2007.

The aim of REACH is to improve the protection of human health and the environment through the better and earlier identification of the intrinsic properties of chemical substances. The REACH Regulation places greater responsibility on industry to manage the risks from chemicals and to provide safety information on the substances.

B+CBagbase Beechfield Bella Bella Canvas Craghoppers Dare2B Finden Hales Front Row Fruit of the Loom Gamegear Gildan Golden Finishes (Ready Range) Hanes Henbury Just Cool by AWDis Just Hoods by AWDis Just Sub by AWDis Kariban

Kustom Kit I otto Madeira Mascot Mumbles Nimbus PF Concept Premier Quadra Regatta Result RTX RTY SkinniFit Russell Europe TheMagicTouch Tombo United Brands Westford Mill

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# **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.

## **American Apparel**<sup>®</sup>

#### SOCIAL COMPLIANCDEATE POLICY

American Apparel is dedicated to ensuring that all employees are treated with humanity, dignity, and all employees are entitled to his or her rights. The company strives to fulfill its responsibility by supporting the assurance of a socially responsible work environment.

#### **NO CHILD LABOR**

American Apparel employees must be the minimum legal working age.

#### NO DISCRIMINATION

American Apparel seeks to hire, retain, promote, and otherwise treat all applicants and employees without regard to race, color, religion, age, sex, gender or gender identity, sexual preference, marital status, national origin, ancestry, citizenship, veteran status, physical or mental disability, medical condition, pregnancy, or any other characteristic protected by applicable law.

#### WAGES

All employees are paid at least the minimum national and/or legal wage in accordance to state, federal and/or local laws.

All employees are offered the opportunity to receive benefits.

#### WORKING HOURS

Employee hours are set in accordance to state, local, and/or federal law.

Overtime will be paid in accordance to state, local, and/or federal laws.

Employees are entitled to at least one day off from work per week.

#### HARRASSMENT AND ABUSE

American Apparel does not tolerate harassment of employees by another employee, supervisor, or any vendor or customer. Harassment of third parties by American Apparel employees is also prohibited. Any form of harassment on the basis of race, religion, color, national origin, ancestry, legally protected medical condition, marital status, sex (including pregnancy, childbirth, or related medical conditions), gender identity, age, veteran status, sexual orientation, or any other basis protected by federal or state, or local law is a violation of this policy.

#### WORKING CONDITIONS

All employees are provided with a clean, safe and healthy work environment.

All factory employees have access to clean drinking water, clean storage area for lunches, and adequate number of restrooms.

All machinery is maintained at a standard to ensure that workers are not at any unreasonable risk while operating the machinery.

First Aid equipment is available in the factories and a person with basic first aid training.

#### MODIFICATION OF POLICY

Our Social Compliance Policy may be amended from time to time at our sole discretion and without notice. This policy is subject to and is not intended to replace or supplement our Employee Handbook, Human-Resources and/or company polices and procedures.



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.

#### JUST SUB AWDis:

In launching such an important new brand we were determined that Just Sub should be produced in factories conforming to WRAP (Worldwide Responsible Accredited Production) standards and which are certified to their strict regulations.

In a market dominated by ecologically and ethically aware young people who are increasingly discerning about where their clothing comes from, the WRAP logo and what it stands for we think is very important.

WRAP certification of our factories ensures that all garments come from lawful, ethical and humane manufacturing sources. This applies right back through the supply chain.

We take the future of our planet as seriously as our customers.

#### 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 association 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.

## boxercraft

Boxercraft are a member of the Fair Labor Association and subscribers to the International Labor Organization. Factories independently certified by top US retailers.

Employee Happiness is a core value and top priority at Boxercraft. America's number one spirit wear source. Boxercraft is among the most reputable and best places to work in their respective countries, including Central America. We offer our employees affordable health insurance, fair wages, a programme of paid days off, and more. All Boxercraft facilities are sweat-shop free environments. As members of the Fair Labor Association, we support continued efforts to ensure our factories are the most desirable employers in their respective countries.

#### BELLA+CANVAS

#### SOCIAL RESPONSIBILITY

#### Eco-Friendly Fashion

We strive to use sustainable fabrics like 100% organic cotton whenever possible.

#### Promoting a Healthy Lifestyle

We provide natural, organic food and drink to employees and have a company gym for use anytime.

#### **Solar Power Headquarters**

We have reduced our energy usage by 5,000 kilowatts per month.

#### Green Office Supplies

We reduce, reuse, and recycle.

#### Natural Cleaning Products

We use bio degradable, non-toxic, and hypoallergenic cleaners.

#### Hybrid Company Car

We advocate for fuel efficiency and carpool.



We at bella believe in living a healthy, balanced lifestyle while minimizing our impact on the environment.

#### BROOK TAVERNER

corporate tailoring

#### **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 Rights of the Child. 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.



#### Mission

A central element of our Company's overall mission is to set the gold standard for sustainability in the apparel industry. We are firmly committed to environmental responsibility, and this commitment is evidenced every day in all of our business dealings and practices with our employees, customers, vendors and suppliers, and the community at large. We view all of these individuals and organizations as our partners in the pursuit of environmental responsibility.

#### **Overall Strategy**

We are continuously monitoring sustainability as it relates to all internal and external aspects of our business, and we are committed to following a strategy that includes the following:

· Monitoring and upgrading all aspects of our Company's sustainable

practices and performance, especially in terms of recycling, conserving energy, and using resources efficiently and responsibly.

- Establishing challenging sustainable goals in all operational areas,
- and monitoring achievement in these areas on a regular basis.

• Regularly reviewing, assessing, and upgrading sustainable practices in all departments, divisions, and facilities.

 Communicating our policies, standards, and expectations regarding sustainability to our employees, customers, suppliers and vendors, and the community at large.

• Providing formal and informal training to help our employees understand their responsibilities in terms of sustainability.

• Using all communication channels to emphasize and recognize sustainable practices and outcomes.

 Working with elected officials, appropriate governmental agencies, and local business organizations to learn about new sustainable developments and gain additional insight into innovative and creative sustainable programs.

#### People

We believe that anyone directly or indirectly connected with our organization plays an important role in developing and maintaining successful sustainable practices, especially the following:

#### Employees

Employees at all levels are expected to understand our Company's commitment and policies regarding sustainability, and to carry out all aspects of their work in accordance with this expectation. The employees' successes in this area are recognized and rewarded.

#### Customers

We view our customers as our partners in every respect, and we believe that we can learn about sustainability from them, and they can learn from us. We support and recognize their sustainable practices, and we encourage them to take advantage of the sustainable services that we offer, such as paperless invoicing.

#### Vendors and Suppliers

We work with our vendors and suppliers to be sure that their workplaces adhere to the highest sustainable practices, and that they use environmentally responsible materials in providing goods or services to us.

#### Local Governmental Agencies

We meet regularly with the City Councilman from our district in order to stay current on a broad range of local sustainable matters including waste disposal, public transportation, and consulting/auditing services offered by the City of Los Angeles.

#### Sustainability Awards

In 2008, 2009, and 2010, Strategic Partners was honored by the State of California as a winner in the Waste Reduction Awards Program (WRAP). This Award is granted by the California Integrated Waste Management Board. This Board, a section of the California Environment Protection Agency, is the state's leading authority on recycling and waste reduction. The WRAP Award is given to a select number of companies that have successfully taken a broad range of steps to reduce waste, manage materials, and protect public health, safety, and the environment. As Waste Management Board Chair Margo Reid Brown said, companies that win this award "will be at the forefront of a more sustainable California."

Also in 2008 and 2009, the Company was honored with two Certificates of Environmental Accomplishment for participating in Shred-It's shredding and recycling program. As a result of our Company's efforts in this area, a total of 47 trees were saved. We anticipate saving even more trees through this program by the end of 2010.

#### **Ongoing Programs**

We have a wide range of sustainable programs in full operation at our corporate office, distribution center, and at several of our suppliers:

#### Corporate Office, Chatsworth, CA

 The Corporate Office has an ongoing and incentivized Ridesharing Program, and approximately 30% of the employees use carpools, bikes, hybrids, motorcycles, or public transportation to get to and from work. The Company has implemented alternative work schedules in some departments in order to save fuel, reduce pollution, and help employees save money.

 The air conditioning systems for the offices are on programmable thermostats which are set to turn off after hours and on non-working days.

4. When employees leave their offices for any reason, the policy is to turn off the lights.

5. It is standard practice for employees to turn off their computer monitors at the end of the work day.

6. Every office has a blue trash can for all recyclables.

7. There is a blue recycle receptacle for plastic bottles, glass, and aluminum in the Break Room and strategically located at the coffee bars and in the conference rooms.

8. All old batteries are collected and recycled via the mail room.

9. All used ink cartridges are sent back to the manufacturer for recycling.

10. There is a complete video conferencing system that helps reduce travel.

11. It is company policy to purchase environmentally friendly products, such as cleansers, trash bags, light bulbs, and paper.

12. All email contains the message: "Please consider the environment before printing this email."

13. Employees are advised to print non-confidential information on both sides of a sheet of paper.

14. The Company provided major publicity and support for the "Cash for Clunkers" program.

15. The Company utilizes electronic invoicing and account statements, and this is saving approximately three tons of paper per year.

16. Employees are encouraged to go to http://www.catalogchoice.org to reduce the number of unsolicited catalog mailings.

17. Employee suggestions for sustainability are actively sought and frequently implemented.

18. Employees whose suggestions are implemented are provided with prizes such as a Starbucks certificate.

19. As a matter of policy, the cleaning crew monitors all of the trash on a daily basis and removes all recyclables before such trash is put into the bins.

20. One of our vendors, Greenwaste, takes all of our recyclable trash to a recycling center.

21. Before any trash is taken to a landfill, Athens, another vendor to our Company, further resorts all of the trash and removes recyclables.

22. In order to reduce the use of paper towels and water, Purell antibacterial hand sanitizers were installed in all bathrooms.

23. The Company uses an outside firm, Shred-It, to shred and recycle papers. These efforts saved the equivalent of 47 trees in 2008/2009.

24. All unnecessary lights are disconnected, such as those in the vending machines in the Break Room.

25. Waterless urinals were installed in the Corporate office restrooms, leading to a savings of approximately 80,000 gallons of water per year.

26. The company also installed aerator faucets and increased irrigation controls to further reduce water consumption.

27. The Production Department implemented new packaging rules that led to a savings of approximately 20,000 cartons per year, equaling a reduction of approximately 2%. The goal is increase savings to approximately 100,000 cartons.

28. As a way to combine social responsibility with sustainability, the company gives outdated reorder hanger references to several charitable groups and organizations. These groups take the old fabrics and re-sew them into different items: 1) In some cases, they are converted to quilts which are then donated to families that take possession of Habitat for Humanity homes; 2) A Catholic Church charity converts some of these materials into teddy bears for after-school programs, foster children, and women in correctional institutions to give to their children during family visits; 3) A Lutheran charity converts them into quilts and sends them around the world.

29. In 2010, Strategic Partners added ADP's Human Resources & Benefit (HRB) system to streamline a wide range of human resources processes. The HRB system allows the company to go paperless for the main components of numerous programs, most recently in open enrollment for medical insurance.

30. Also in 2010, Strategic Partners received a Certificate of Recycling from BCS Recycling Specialists/Asset Management. This Certificate indicated that the computer scrap from Strategic Partners was recycled in accordance with all State and Federal regulations. The total amount of scrap was 1,681 pounds, all of which was diverted 100% from U.S. landfills.

31. As part of the company's continuous efforts to reduce, reuse, and recycle, the company gave the following materials to all employees: 1) SPI reusable lunch bags, reducing the need for trash pickup of thousands of bags each year; 2) SPI water bottles which are used instead of commercial water bottles or paper cups, 3) Reusable coffee mugs, signaling the end of Styrofoam® cups at SPI, and saving approximately 80,000 cups per year; 4) Ceramic utensils, eliminating the use of thousands of pieces of plastic silverware every year.

32. For a period that covers March, 2004 through July, 2011, Strategic Partners has received a Certificate of Compliance from Greenguard Environmental Institute (GEI), an industry-independent nonprofit organization that oversees the Green-guard Certification program. GEI establishes acceptable product standards for building materials, interior furnishings, cleaners, electronics, and children's products, as well as setting standards to protect the health of occupants through control of mold, moisture, and indoor pollutants. The Certification from GEI indicates that the Strategic Partners' furniture, flooring, and associated products are all well within the established limits for TVOC, Formaldehyde, Total Aldehydes, Individual Voc3's, and 4-Phenylcyclohexene.

33. SPI now has a special bin where employees can deposit all of their old writing instruments from Papermate®, Expo®, and Sharpie®. Not only does this reduce trash in the landfills, but \$.02 is donated to charity for every writing instrument that is placed in the bin.

34. All of the company's computers are measured against the Electronic Product Environmental Assessment Tool (EPEAT), a procurement system that helps companies evaluate, compare, and select products based on environmental attributes. All of the company's computers are at least at EPEAT's Silver Level, and one model is at their Gold Level.

35. All of the company's copiers are manufactured by Canon USA, a recipient of the EPA's 2010 Energy "Partner of the Year" Award. These copiers are specifically designed for low carbon emissions, reduced energy usage, reduced material consumption, restricted emission of hazardous chemical substances, and use of 100% recycled plastic on various exterior parts.

36. We regularly attend meetings of the Business Council for the Chatsworth-Northridge Industrial Core. These meetings are chaired by Greig Smith, the City Councilman for this area. The discussions and speakers often focus cost-reducing environmental programs to help companies go green.

37. In 2008, we voluntarily requested the Los Angeles Bureau of Sanitation/ Department of Public Works to conduct a Waste Audit for the corporate office. Ms. Rene Spencer, Environmental Specialist for the City, conducted the audit. In her report, she concluded that the Company's programs are so strong that we should apply to the State of California Waste Reduction Awards Program WRAP), a step that the Company has taken for the past three years.

#### **Distribution Center, Dallas, TX**

 The Distribution Center (D.C.) recycles every piece of corrugated paper and most other paper as well. The D.C. has a compactor and bin for this specific purpose. The D.C. recycles approximately one million boxes per year.

2. The D.C. has just put in a new energy-efficient lighting system that has led to approximately 1/3 reduction in electrical consumption. In addition, the bulbs in this new system are a new series that do not contain mercury and are biodegradable.

3. The D.C. is in the process of reviewing all electrical consumption in the building, with the goal of achieving an additional 3-5% savings in

electrical usage.

4. Many of the D.C. employees participate in carpools.

5. All old batteries are collected and recycled by Interstate Power Care. And further, as a result of our Company's efforts in this area, Interstate has implemented a major battery recycling program with all of their customers.

6. The air conditioning systems for the offices are on programmable thermostats which are set to turn off after hours and on non-working days.

7. There are blue recycle receptacles for plastic bottles, glass, and aluminum in the Break Room. Each office area has a blue trashcan for all recyclables. Management is looking into supplying each office with its own recyclable container.

8. All used ink and toner cartridges are sent back to Recycle Cartridges for Kids. They recycle these materials and donate the proceeds to a charity of the Company's choice.

 All offices, supply rooms, and restrooms have automatic sensors on the light switches that turn off the lights when the room is unoccupied.

10. The D.C. and corporate offices are in the process of testing and converting cleaning supplies and paper products over to products that are "Green Seal" Certified in order to eliminate the use of nonbiodegradable substances.

11. The D.C. is in the process of adding auto flush valves on all of the restroom fixtures, not only for sanitary reasons but also for the reduction in water usage.

12. The D.C. is in the process of converting all conventional faucets and soap dispensers over to "no touch" systems, not only for sanitary reasons but also for the reduction in water and product usage.

13. The D.C. is in the very early stages of looking into Solar Power and Geo Thermal capabilities for the facility.s.

#### Suppliers

1. All of the fabric mills that we use have water treatment systems to meet all legal standards.

2. The Company has partnered with several factories that have active programs for solar electricity.

 The factories that the Company uses have vents and fans, rather than costly/high energy air conditioning systems, to cool their buildings.

These factories also have double-paned windows to reduce the use of energy for heat, as well as to insulate year round.

5. Several of these factories have cost-saving/energy-saving underground heaters.

6. The Company has established programs with a number of suppliers to take fabric remnants that would normally be sent to a dump and convert them into bags and other giveaway items.

7. The Company is continuing to take active steps to reduce the number of boxes being used by maximizing the content not only in shipping, but in terms of goods from our suppliers. As part of this process, box sizes are also being reviewed.

 The step noted above will also reduce the number of containers that are required, which ultimately translates into a savings of fuel required for transport.

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#### The Ethical Trading Policy process comprises of 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.



#### **Ethical Trading Policy Statement**

#### 1.0

It is Williamson-Dickie Europe Ltd's policy to protect the health, safety, and welfare of personnel involved in producing our products.

This document is prepared in order to give guidance and instruction on the minimum and recommended standards acceptable to Williamson-Dickie Europe Ltd in the manufacture of their products.

Judy Clay

Corporate Director

#### 2.0 Employee Safety

2.1 Fire Evacuation and Prevention

The factory should have an established evacuation procedure which every employee should be aware of.

Fire drills should take place annually.

All fire exits should be clearly marked and free from obstructions.

Fire extinguishers should be provided in all main work areas.

Records of regular servicing and inspection of fire extinguishers should be available.

2.2 Clearways and Walkways

Clearways and walkways should be marked out in the manufacturing areas to allow fast and safe evacuation. There should also be sufficient space between machinery to allow the same.

The clearways should be free from obstruction and non-slippery. They should be very obviously marked, with arrows indicating the direction of exits.

2.3 Machinery Guards and Electricity

Fixed guards should be used wherever possible on moving parts.

Pulley guards should be fitted to all machines with an exposed pulley wheel/belt.

Eye guards should be fitted to all special/automated machines, to protect from broken needles etc.

Finger guards must also be fitted (where appropriate) to automated machines, stud / snap machines, etc.

All electrical connections should be inspected regularly, and faults should be recorded and repaired by a qualified electrician.

All electrical panel boards should be clearly marked as a hazard and secured with a cover to prevent unauthorised access.

2.4 Personal Protective Clothing

Personal protective clothing must be made available wherever there is a risk to health and safety.

Cutters must wear steel mesh gloves, and appropriate gloves and safety spectacles must be available in the machine repair shop.

#### 2.5 First Aid on Site

Factories should have first aid kits available and staff trained to administer first aid. The minimum requirement is to have one first kit and trained first aider for every 100 members of staff.

First aid kits should be available in all main work areas and should be fully stocked with standard first aid items.

#### 2.6 Training

All employees who operate machinery are required to have received

training on how to use the machinery safely, including:

- · How to use the machine
- · How to stop the machine
- · How to ensure that all machine guards are positioned correctly

#### 3.0 Working Conditions

#### 3.1 Lighting

Adequate lighting must be provided during working hours.

3.2 Temperature/Ventilation

The temperature in work areas should be maintained at a level acceptable to workers, with adequate ventilation provided, especially in areas where adhesives and other chemicals are used.

#### 3.3 Noise Levels

Noise levels should be kept to a reasonable level.

#### 3.4 Factory Cleanliness

A good standard of housekeeping, organisation and cleanliness should be achieved and maintained. Fabric and garments left on the floor is unacceptable.

#### 4.0 Employee

#### 4.1 Toilets

An adequate number of enclosed toilets should be available, with separate male and female facilities.

The toilets should be separate from manufacturing and rest areas and should be kept clean and hygienic at all times.

Water, soap and basins should be provided for hand washing.

4.2 Food Hygiene and Eating Facilities

An area separate from manufacturing should be provided for the consumption of meals. This area must be kept clean.

Where cooking takes place on site, the cooks must have the relevant food hygiene training and certificates, as per the national law.

4.3 Provision of Drinking Water

Clean drinking water must be available to all employees.

4.4 Storage of Personal Belongings

Employees should have a secure space in which to store their personal belongings, away from the main work areas.

#### 4.5 Dormitories

Where it is necessary for a factory to support its workforce, the dormitory should be in a separate building to the factory. Each employee should have an individual sleeping area with a privacy curtain and adequate lighting and ventilation.

#### 5.0 Employment of Young People

#### 5.1 Minimum Age Level

It is the policy of Williamson-Dickie Europe Ltd to ensure that young people are not exploited. Williamson-Dickie Europe Ltd and its suppliers must confirm that the age of employees meets the legal minimum for that country, or at least 16 years old (whichever is greater).

#### 5.2 Forced Labour

It is the policy of Williamson-Dickie Europe Ltd not to work with suppliers who use forced/compulsory labour, including prison labour.

#### 6.0 Terms and Conditions of Employment

6.1 Race and Gender Equality

All employees must be given employment and career opportunities on the basis of their abilities, irrespective of their gender, race, or religion.

#### 6.2 Hours of Work

Employees should not work more than 6 days in succession and should not work more than 60 hours in one week, including overtime. Regular breaks must be granted.

#### 6.3 Rates of Pay

Employees must be paid at least the national/regional minimum wage, as set by the controlling authority. Williamson-Dickie Europe recommends that employees sign the payroll, to confirm that they have been paid correctly.

#### 6.4 Disciplinary Procedure

Codes of conduct for disciplinary procedures must be documented and available to staff. Employees must be treated with respect and dignity, with documented procedures followed.

#### 7.0 Environmental Impact and Restricted Chemicals

#### 7.1 Waste

Wherever possible, factories must try to reduce, reuse, and / or recycle their waste streams, in order to minimise their impact on the environment

7.2 Chemicals

Suppliers must avoid using any chemicals contained in the REACH candidate list, or authorisation list, in any Dickies products.

Dimethyl fumarate, nickel, and banned azo-dyes are also forbidden from being used in any Dickies products.

#### 8.0 Code of Compliance Auditing

#### 8.1

It is the policy of Williamson-Dickie Europe Ltd to visit and audit all production facilities for safety and social compliance, before placing any orders. Factories are then re-audited on an annual basis. Williamson-Dickie Europe Ltd will not place orders with factories that have not passed our Code of Compliance Audit.



As one of the world's leading garment manufacturers, we recognise our responsibilities to the environment and the community.

All of our garments whether made at our Moroccan manufacturing plant or sourced from third party suppliers are approved to Oeko-Tex Standard 100. This certifies that they contain no substances harmful to people or the environment. Oeko-Tex is an internationally renowned testing certification system for textiles. Test criteria are standardised across the world and include tests for ph-value, pesticides and heavy metals. Only when a garment is proved to contain no harmful substances is it granted Oeko-Tex approval.

In addition, all Fruit of the Loom facilities and those of our suppliers are now WRAP certified. WRAP is an internationally recognised third party certification dedicated to ensuring lawful, humane and ethical manufacturing throughout the world.

As well as independent third party accreditations, we also have our own very stringent Code of Conduct, which applies not only to Fruit of the Loom, but to our suppliers, distributors and business partners. Our Code of Conduct, the Fruit Code, is more than a policy, it is a way of like.

#### CODE OF CONDUCT

Fruit of the Loom (FOL) is committed to conducting our business in accordance with the highest standard of business ethics and respect for human rights. We require our suppliers, licensees, distributors and other business partners to meet these high standards.

We appreciate that other countries have different cultural, legal and ethical systems. However, the Fruit Code states that any facilities we use, whether owned by the company or our contractors, licensees or other business partners must always satisfy certain basic requirements.

#### COMPLIANCE WITH LAW

FOL requires that all facilities operate in compliance 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.

#### FORCED LABOUR

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

#### HARASSMENT OR ABUSE

Facilities must treat all employees with respect and dignity and should have procedures in place to protect employees from physical, sexual, psychological or verbal abuse. In addition, facilities may not use monetary fines as a disciplinary practice.

#### 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 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 be entitled to at least one day off in every seven-day period. All overtime work shall be optional. Employers shall not require overtime on a regular basis and shall compensate all overtime work at a premium rate.

#### 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 and requires that all facilities recognise and respect the same.

#### ENVIRONMENTAL COMPLIANCE

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

#### SUBCONTRACTORS

Facilities will not utilise subcontractors in the manufacturing of Company products or components without the Company's prior written approval and only after the subcontractor has agreed to comply with this Code of Conduct.

#### CUSTOMS COMPLIANCE

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

#### SECURITY

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

#### POSTING REQUIREMENTS

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

#### RECORD KEEPING

Facilities must maintain complete and accurate records with respect to each of these elements to allow for verification of compliance with this Code of Conduct.

#### ENFORCEMENT

FOL employs internal, as well as third party auditors, to ensure compliance with this Code at all locations conducting business for FOL. The Company maintains detailed records of all facilities' compliance with this Code of Conduct.

# 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.



# SUNDERLAND

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

Glenmuir and Sunderland are 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 government 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 behaviour.

#### **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 business.

#### **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.



#### Harvest are a member of the New Wave Group

Social Code of Conduct: The New Wave Group has a responsibility to ensure that its own operations and those of its suppliers respect the legal requirements in various countries as well as international organisations' views of basic rights. The New Wave Group has been a member of the Fair Labor Association since 2008. The FLA's code of conduct, to which the New Wave Group has conformed its code, provides the same customer requirements to all suppliers, thus making it easier to implement requirements, to institute training, to conduct evaluation and audits, and for the supplier to comply.

#### The Environment:

Eco-friendly offices: All companies in the New Wave Group strive to reduce their consumption of water, electricity and paper, to eliminate waste, and to ensure hazardous materials are disposed of properly.

**Packaging:** Production units are using recycled materials such as plastic bags and cardboard cartons for shipping product as well as reducing and eliminating unnecessary packing material.

Chemical use: Quality control visual inspections allow the New Wave Group to maintain strict control over the chemical substances used in and for its products. The Group is committed to taking steps to reduce, substitute and eliminate chemical substances that are harmful to the environment.

Green production: The New Wave Group is developing sustainable products using new materials such as organic cotton and recycled fabric. The Group also imposes strict requirements on its suppliers to use humane treatment on animals including but not limited to certification against plucking feathers from live birds.



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.

# KOOGÃ

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.

bargear Serve in style



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 confinuing 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.



The ideals of LOTTO are the ideals of sport, and LOTTO seeks to promote fairness, honesty, mutual understanding and high ethical standards not only on the sport fields but also in the factories which make LOTTO products. These principles are based on the international labour standards outlined in the relevant Conventions of the International Labor Organization (ILD), as well as on the Code of Conduct promoted by the Worldwide Federation of the Sporting Goods Industry (WFSG). LOTTO also acknowledges that factories operate under differences merit understanding and respect.

## maddins

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 nontoxic 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.



#### Corporate Social Responsibility

MASCOT are one of Northern Europe's largest producers of Workwear and we consider social responsibility as a natural part of developing a business.

With MASCOT the goal is not only to create a profitable business but also to meet our ethical, social and environmental responsibilities as a company.

MASCOT's social responsibility covers a lot and includes relationships with suppliers, customers and employees in connection to the environment both locally and globally.

#### Code of conduct

At MASCOT we work from a global Code of Conduct which consists of a series of basic principles for ethical and responsible conduct throughout the world. Compliance with both national and international legislation and international conventions for example in connection with our own factory in Vietnam and external suppliers is taken as a matter of course. Read more about our Corporate Social Responsibility and the steps we have taken for our employees in MASCOT's own factory in Vietnam.

#### Employees

We focus on creating a good environment for employees, because we believe that good working conditions are a requirement for employees to actively participate in developing the company. Therefore, we have open and clear personnel policies where there is the possibility for diversity and development.

At MASCOT's own sewing facility and raw material warehouse in Vietnam we focus especially on preventative health measures and high safety levels. Actual initiatives include the recruitment of our own doctor and nurse at the factory, healthy and nutritious meals for employees, good pay, trade unions and an 8 hour day.

#### Local Community

As a family owned company headquartered in Silkeborg, Denmark, we place great importance in playing an active role in the local community and provide support to various activities and associations. We also provide sponsorship.

#### Environment

As a business we must take part in the responsibility of protecting our environment. All our suppliers commit to adhere to their countries current applicable laws on the environment.

## ::NIKEGOLF 🛩

#### FREE, FAIR AND SUSTAINABLE TRADE

We advocate for free trade by seeking improvements in existing global, multilateral, regional and bilateral agreements, as well as by seeking new, innovative agreements and challenging protectionism. We believe free, fair and sustainable trade encourages growth, investment and innovation and serves the interests of workers and consumers globally. Our objectives include seeking the elimination or reduction of import duties, protecting intellectual property rights and establishing mechanisms that promote sustainable trade and growth. We also seek policies and government action that promote the efficient and secure transport of products. We believe we can help create opportunities for workers and communities by advocating for sensible labour and environmental provisions within trade agreements. For example, in Vietnam, we meet regularly with the Vietnam Ministry of Labour as they review and update their labour laws. This is a process undertaken by the government of Vietnam every five years.

#### INTELLECTUAL PROPERTY

We advocate for intellectual property policies that support innovation, development and consumer trust. For example, we have actively contributed to the Anti-Counterfeiting Trade Agreement, a new international treaty currently undergoing ratification in several countries.

#### ACCESS TO SPORT

Our policy agenda also includes the promotion of access to sport and physical activity in the various geographies in which we operate. We build coalitions and encourage governments to develop policies that promote physical activity and education in schools and places for vouth to play.

#### SUSTAINABILITY

Through partnering with governments and other stakeholders, we promote public policies that reward innovation, as well as sustainable business models that meet the expectations of our consumers. The key policy areas in which we focus are climate change; the sustainability of materials, products and supply chains; resource efficiency; and post-consumer waste.

Nike has been a committed member of the U.K.'s Sustainable Clothing Action Plan (SCAP) and is actively engaged in policy initiatives focusing on resource efficiency, sustainable transport and carbon footprinting. In the U.S., we helped to create Business for Innovative Climate and Energy Policy (BICEP), a business coalition that advocates for climate-change legislation.

#### ENERGY AND CLIMATE APPROACH

The energy use and GHG emissions under our direct control – i.e., our office buildings, distribution centres, retail stores and a portion of business travel – represent a small slice of the lifecycle carbon footprint of our products. We report1 our energy use and GHG emissions from those sources, as well as from finished-goods contract manufacturing facilities and inbound transportation.

There are 6 Greenhouse gases - SF6, CO2, CH4, NO2, HFCs, PFCs. We have phased out of SF6 and no longer use it. The majority of our measured emissions are CO2. Facilities and Footwear includes CH4 and NO2 and are rolled up into a reported CO2e calculation. For simplicity we speak to all of our measured emissions in tons of CO2 since it is the predominant unit of measurement.

We are still working to identify the full lifecycle energy and GHG impacts of individual Nike products. So far, we understand that substantial amounts of energy are needed to create the materials that go into our products and to maintain them in the use phase (i.e., the washing and drying of apparel). We have developed a methodology to assess impacts across the value chain and are working to scale up this effort across our wide array of products.

#### LABOUR INTRODUCTION

NIKE, Inc. has worked to improve labour conditions in our footwear, apparel and equipment supply chains for more than 15 years. Key issues in which we have engaged include the health and safety of the workers who make our products, excessive overtime, the ability of workers to freely associate, and child labour and forced labour. We have been working with contract factories to build their human resources management skills and help them reach even higher levels of economic, social and environmental performance. Our work has centred around three fronts:

- · Working conditions in factories: environment, safety and health
- · Labour rights, freedoms and protections
- Workers' lives outside of the factory, and living conditions in their communities

#### CHEMISTRY INTRODUCTION

We are committed to making our products in ways that protect workers, consumers and the environment – all while delivering the high quality and performance for which we are known. One aspect of this commitment is to eliminate, reduce and responsibly manage hazardous chemicals in our supply chain.

#### CHEMISTRY APPROACH

Our material vendors use chemicals in dyeing and other processes, and our contract manufacturing facilities use them in making footwear, apparel and equipment. We have programs in place that restrict the use of certain chemicals, promote the use of "green chemistry," encourage better choices in the design of products, and empower and encourage our vendors and contract factories to identify toxics in their processes and find alternatives.

#### WASTE INTRODUCTION

As environmental issues go, reducing waste is a pretty easy sell. After all, waste results in lost natural resources and lost profit.

At NIKE, Inc., we define waste as any material purchased anywhere in our supply chain that does not ultimately end up as a useful component of product, or cannot be reused at the end of product life. This includes packaging, shipping material and product samples, in addition to a wide range of manufacturing waste such as scrap fabric, leather and rubber. This definition – which is broader than most companies' – forces us to think about waste at all points across our value chain.

Our ultimate, long-term vision is the conversion of raw materials into finished products with zero waste, as well as "closing the loop" on materials use – that is, using only materials that can be fully recycled.



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.
- Portwest staff from UK and Ireland visits the factories twice each year and again progress toward achieving WRAP certification is monitored.



At Premier we aim to achieve the highest ethical and environmental standards and we only like to work with manufacturers that do the same. To make sure our credentials are impeccable we have a detailed code of conduct that's integral to the way we do business and all our suppliers and their sources must sign up to it. It's based on the very best employment ethics, health and safety practices and environmental considerations. So when you purchase any of our goods you can be sure that they have been produced lawfully, through fair and honest dealing, in decent working conditions and without exploiting the people who made them. Any environmental impact during production and transportation has also been kept to a minimum.

Premier also has the right to run audits and spot checks, personally or via external parties, on our suppliers' premises without their prior knowledge to verify that they are behaving in an appropriate manner and upholding our values. Just one more way that you can trust us to make a difference to people and the planet.



## CRAGHOPPERS

EXPERT

#### **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.

# Result<sup>®</sup> SPIRO

#### **Corporate Responsibility**

At RESULT we see corporate responsibility as key in how we conduct our business and believe it makes good sense to run 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 communities in which we operate within the UK and overseas by creating opportunity, skill development and support in emerging economies.

Needle & Nickel Detection. Junior and youth garments are submitted to stringent needle detection procedure by metal detector prior to packing at source. All garments are tested to ensure all trims are nickel-free.

RESULT Assurance. RESULT delivers value to our customers with its assurance of excellence but we 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 asks customers to ensure the garment is clean, particularly when the garment has been in contact with animals or chemicals. RESULT reserves the right not handle or repair any garment which it feels would compromise the health and safety of its operatives.

#### **Brochure Colour Reproduction**

RESULT designers take great care with garment colour in our brochures. Limitations of media print may mean shade variations with images. Pantone references are supplied for guidance only.

#### **Product Description**

Every reasonable care has been taken to ensure that the descriptions are accurate. However, specifications may change & RESULT reserve the right to do so where necessary. All garment styles 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 as an infringement under coowright law.

#### Purchaser Responsibility

RESULT products are designed to be worn and all statements, technical information and recommendations herein are based on tests we believe to be reliable. However the accuracy or completeness thereof is not guaranteed so 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.

#### **Decorator Responsibility**

RESULT products are designed to be decorated and all statements, technical information and recommendations herein are based on tests we believe to be reliable & can only be taken as an indication of how the garments may perform. However, accuracy or completeness thereof is not guaranteed so before use, the decorator must determine the suitability of the product for the decoration. Printers in particular employ different techniques and use a variety of products so RESULT does not take responsibility for third party garment decoration and always recommends testing before bulk decoration.

All styles offered are subject to availability.

#### **Environmental Practices**

Being responsible for our impact on the environment. Environment: RESULT demands all suppliers pursue correct environmental practice, including the recycling of waste materials and the re-circulation of waste heat generated in the dyeing process. RESULT insists on the use of dyed fabric free from harmful substance in all products.

#### Recycling

As innovations to fabric recycling evolve, RESULT reserves the right to make running changes to any styles where recycling can enhance performance or lessen environmental impact. All garments using recycled materials within their make-up are marked in this brochure. Recycled bag and packaging is used, together with any other recycled materials on labelling & promotional literature, where possible.

#### REACH

RESULT encourages all suppliers to have full compliance with REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) and ensure no substances harmful to any human or the environment are used in products bearing the RESULT brand.

#### **Trade Associations**

RESULT are members of the following associations:

**REMA:** the Retro-reflective Manufacturers Association monitors all retro-reflective items including Safety clothing and footwear, particularly in the EN471 categories.

NCWA: the National Children's Wear Association monitors safety in the design of all aspects of children's wear.

**SEDEX:** the Supplier of Ethical Data Exchange is a membership organisation for businesses committed to continuous improvement of the ethical performance of their supply chains.

#### FSC

This brochure has been printed using FSC (Forest Stewardship council) certified paper.

#### **Garment Sizes**

UK: imperial. Euro: metric.

Junior: age and height. La Femme: UK ladies fit 8-18 Garment sizes indicated are approximate body fit sizes and for guidance only.

Where multi-language translation appears in any RESULT literature English translation prevails.



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.

#### Environment

RESULT demands all suppliers pursue correct environmental practice, including the recycling of waste materials and the re-circulation of waste heat generated in the dyeing process. RESULT insists on the use of dyed fabric free from harmful substance in all products.

#### Recycling

As innovations to fabric recycling evolve, RESULT reserve the right to make running changes to any styles where recycling can enhance performance or lessen environmental impact. All garments using recycled materials within their make-up are marked in this web site. Recycled polybags and packaging are used, together with other recycled materials on labelling and promotional literature, where possible.

#### **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.

#### Worldwide Responsible Accredited Production

WRAP is an independent, non-profit organisation dedicated to the certification of lawful, humane and ethical manufacturing throughout the world.



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. RTV recognises that the Guidelines will also assist management in selecting business partners and follow work place standards and practices consistent with RTV 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.



Spalding has a comprehensive program to ensure products manufactured by and for our company comply with The Consumer Product Safety Improvement Act of 2008 ("CPSIA"). Our CPSIA program includes testing for all CPSC-regulated standards applicable to our products.

As part of our ongoing CPSIA compliance program, we are:

- 1. Providing a Continuing Certification of Conformity Under the Consumer Product Safety Improvement Act, for general wearing apparel.
- 2. Providing a Continuing Certification of Conformity For Children's Products Under the Consumer Product Safety Improvement Act.

Please be advised that any certifications we provide are for the finished products that we sell. If a blank product we sell is later decorated by a third party, our testing and certifications will not apply to the decoration.

# STORMTECH

#### **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.