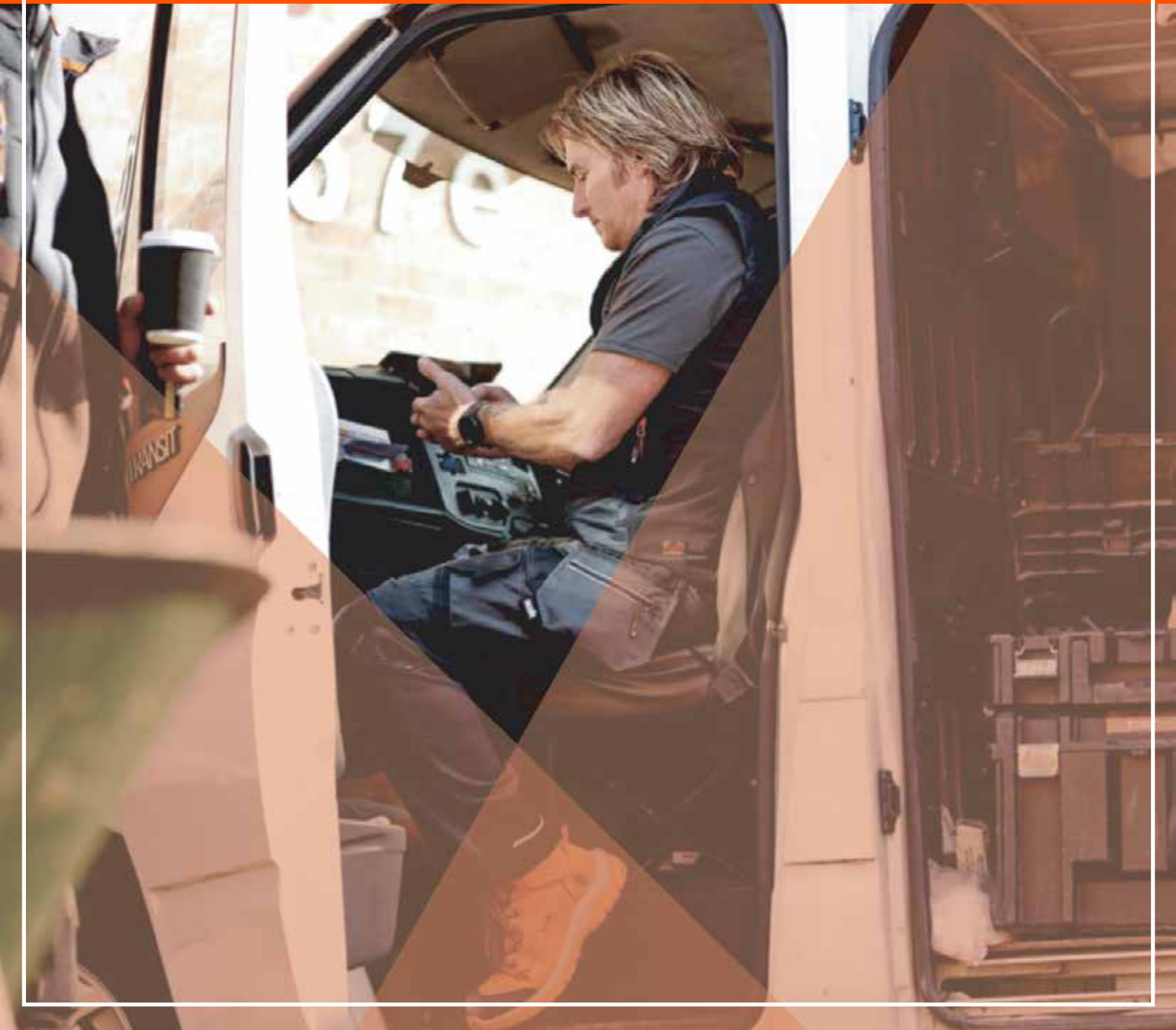


scruffs

ETHICAL TRADING POLICY



INTRODUCTION



Scruffs Workwear LTD recognises the responsibility it shares with suppliers to source products ethically. Scruffs Workwear LTD wants their customers to be confident that the people who make our products are treated fairly, are not exploited or exposed to unsafe working conditions.

This Policy is a core element of the commitment to buy and sell products responsibly and all our suppliers are required to comply with the Ethical Trading Policy (ETP), which ensures key rights for workers. It is based on the Fundamental Conventions of the International Labour Organisation (ILO) and National and International laws.

We will monitor supplier compliance with this policy through a range of tools to support the risk management, continuous improvement and capacity building of our suppliers, including the requirement for suppliers to provide reasonable information as evidence of compliance to our ETP.



2.SCOPE

This policy applies to all suppliers to Scruffs Workwear LTD and is applicable to the supply of goods for resale and goods and/or services not for resale.



3. IMPLEMENTATION PRINCIPLES

COMMITMENT TO ETHICAL TRADING

Our ETP is integrated into our commercial and supplier management activities and our commitment is a key part of our Corporate Social Responsibility programme. We recognise the need to communicate this commitment to key stakeholders including the public, suppliers and the people who work for our suppliers. We seek to develop long-term supplier relationships who share our ethical standards based on the principle of fair, open and honest dealings. Only suppliers that share our standards and can demonstrate compliance will be considered appropriate to trade with Scruffs Workwear LTD.

MONITORING & ASSESSING RISK

We assess our suppliers through robust risk-based systems and monitor accordingly. Our assessment tools determine the level of ethical risk posed by each supplier, with the highest risk supplier sites being required to regularly demonstrate their compliance via our internal ethical audit and to ensure any non-compliances are addressed within the timescales appropriate to the criticality. Through active monitoring we will measure the performance of our suppliers against our ETP and identify emerging trends.

IMPROVEMENT

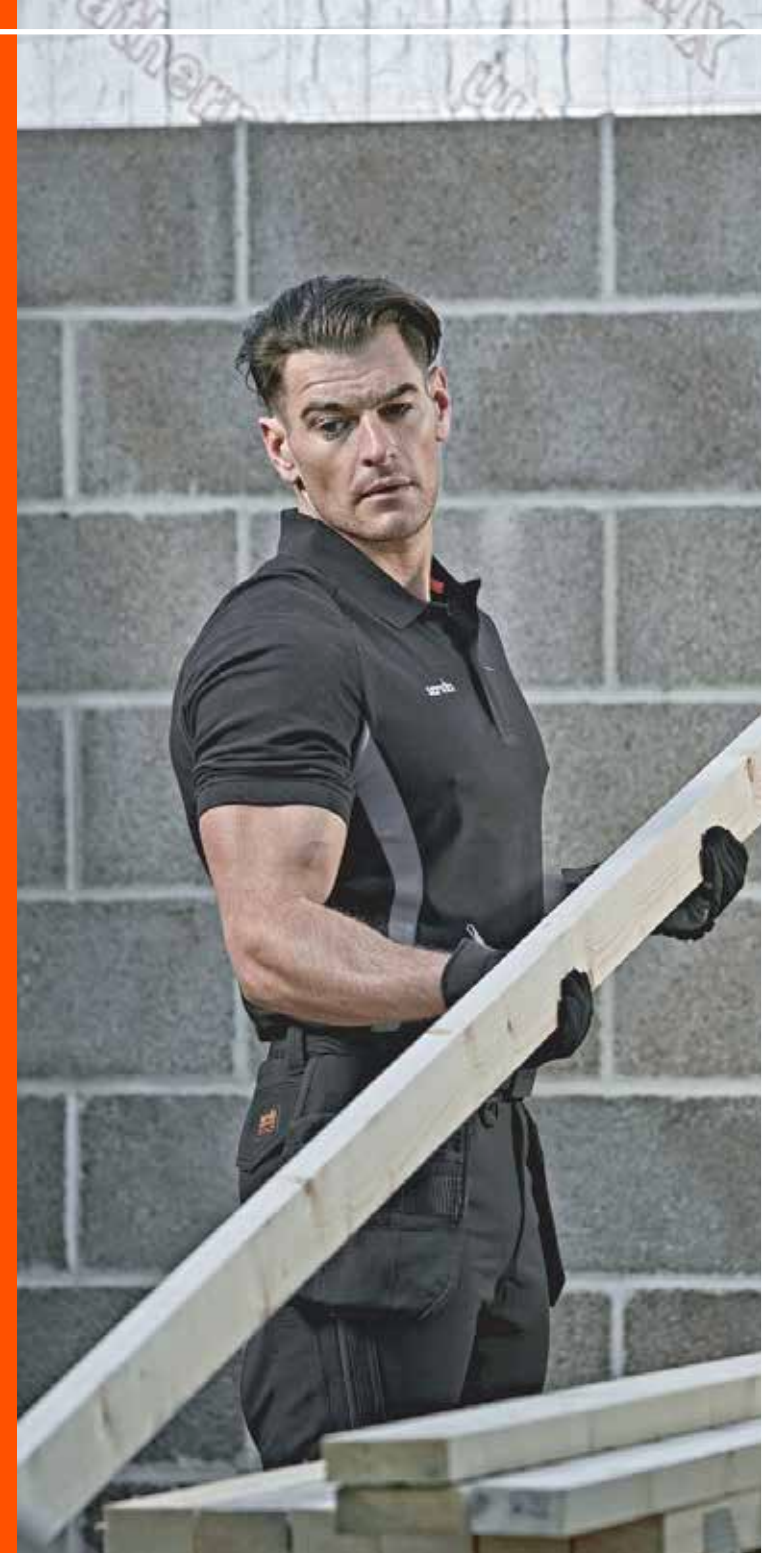
We encourage and support continuous improvement in supplier standards and regularly measure supplier improvement. We recognise some may need time and support to ensure compliance, however, all must demonstrate that any breach of our ETP is addressed in timescales appropriate to the criticality. When alerted to breaches, we will take action we consider appropriate, working with suppliers to

TRANSPARENCY

We strive to be open and honest when we work with others and ensure reporting is fair and transparent.

CAPACITY BUILDING

We are committed to providing guidance, support and training for our colleagues and suppliers to identify and resolve ethical issues.





4.SPECIFIC SUPPLIER REQUIREMENTS

The requirements outlined in this section are in addition to all applicable legislation and industry practice and are in addition to our standard requirements for products supplied to be safe, legal and good quality.

All suppliers are required to:

- •Demonstrate compliance via our internal ethical audit of high risk sites (where applicable)
- •Demonstrate that any breaches of our ETP are addressed in timescales appropriate to the criticality and that systems are in place to ensure that they do not re-occur
- •Demonstrate ongoing commitment to our ETP by ensuring any audit improvements are followed through and standards are maintained and demonstrated on an ongoing basis.



5.SCRUFFS WORKWEAR LTD ETHICAL TRADING POLICY (ETP)

Suppliers shall, at all times, comply with the ETP and with all applicable national and international laws, regulations, codes and standards, both in the country in which the supplier works, and in the country in which the product and/or services are sourced/provided.

Suppliers shall ensure, as far as is reasonably practicable, that their suppliers, agent(s), subcontractors and consultants, who are directly/indirectly involved in the provisions of goods and/or services to Scruffs Workwear LTD comply with this code.

6.SUPPLIERS SHALL ENSURE THAT

Employment is freely chosen.

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

Freedom of association and the right to collective bargaining are respected.

- Workers have the right to join or form trade unions of their choosing and to bargain collectively.
- Employers must adopt an open attitude towards the activities of trade unions and their organizational activities.
- Workers' representatives are not discriminated against and have the access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder the development of parallel means for independent and free association.

Working conditions are safe and hygienic

- Safe and hygienic working environments shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.
- Adequate steps must be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable the causes of hazards inherent in the working environments.
- Workers shall receive regular and recorded health and safety training
- Workers are provided with access to clean toilet facilities and to potable water, and, if appropriate sanitary facilities for food storage shall be provided.
- Accommodation where provided, shall be clean, safe and meet the basic needs of the workers.
- A senior management representative shall be responsible for Health & Safety.



Child labour shall not be used

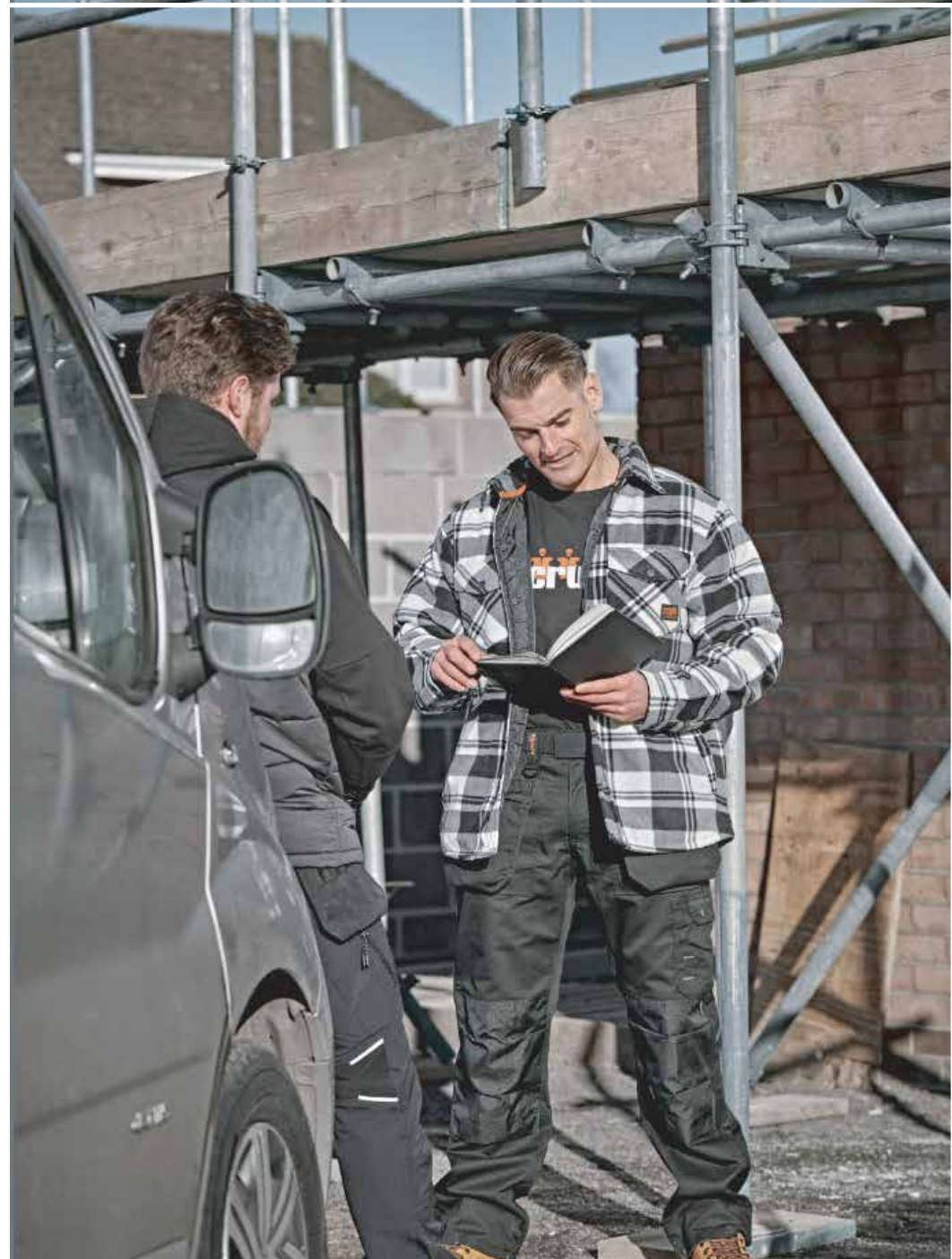
- In the event of a child found to be performing child labour, they must be removed from the workplace immediately. The supplier is to then participate and contribute to the provision for the transition of the child to enable her/him to attend quality education until no longer a child.
- Young persons under 18 shall not be employed at night or in hazardous conditions.
- These policies and procedures relating to Child Labour shall conform to the provisions of the relevant International Labour Organisation (ILO) Standards.

Remuneration

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

Working hours are not excessive

- Working hours must comply with national laws, collective agreements, and the provisions defined in the clauses below, whichever affords the greater protection for workers.
- Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week *
- All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole and not used to replace regular employment. It should always be compensated at a premium rate, recommended to be not less than 125% of the regular pay.





The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by the clause below:

- Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
- This is allowed by national law;
- This is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- Appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.
- *International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

Regular employment is provided

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

No harsh or inhumane treatment is allowed

- Suppliers must ensure a workplace in which any form of harassment is unacceptable, whether physical, actual or the threat of abuse or discipline, sexual, verbal abuse or other forms of intimidations.

Entitlement to work

- Only workers with a legal right to work in the country should be employed.
- For both workers and agency workers, original documents should be reviewed and then returned to workers to verify right to work.y.

Labour Providers

- Labour providers should only supply workers registered with them.
- Relationships with Labour providers should be covered by a Service Level Agreement which meets all national legal requirements.
- Labour providers should be independently audited on a regular basis to ensure compliance with national requirements/legislation.

