



## **Responsible Sourcing Commitment**

Boden believes in fair work places, where the rights of workers throughout the supply chain are protected and respected. A partnership approach with our suppliers and collaborative relationships with all stakeholders are key to delivering this in the long term.

The following document outlines our expectations for our suppliers and how we expect to work together to meet these expectations and provide our customers with products they can both love and trust.

### **Traceability and Transparency**

We are committed to full traceability of our supply chains for all Boden products. Suppliers must provide full and accurate supply chain transparency when requested during the stages of the buying process.

Any omissions or refusals to share information could have an impact on the process for all new suppliers and factories coming on board.

Where there are supply chain changes expected due to either product development or business necessity, suppliers must inform the relevant product teams, particularly; Garment Tech, Buying and Ethical Trade and ensure that this is a minimum of three months prior to the start of production.

### **Subcontracting**

Boden are committed to be part of a socially and environmentally responsible supply chain; all production of Boden goods must be in approved factories and any use of subcontractors must be with our prior written consent.

Suppliers are required to monitor approved subcontractors for social and environmental responsibility.

Subcontracting includes any part of production happening outside the main factory including but not limited to: Garment Dying, Washing, Laundry, Printing, Sewing, Packing, Embroidery and Embellishment, Beading, Crochet, Hand Knit, Homeworking, Plating and Packing.

### **Fairer Work Places and Human Rights**

The people who make Boden clothing are at the centre of our ethical trade programme. We work in ongoing partnership with our suppliers to support fair work places within the supply chain. This means going beyond legal and Ethical Trading Initiative ("ETI") base code compliance. As we go forward we will be widening our due diligence scope to ensure we are integrating a human rights approach to the people in our supply chain.

UN Guiding Principles and Protect, Respect and Remedy Framework set out the principles of the corporate responsibility to respect human rights - please follow this link for the framework.

[http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

## Our membership of ETI and what that means for suppliers working with us

In 2008, Boden joined the ETI and adopted the ETI Base Code as an integral part of this Responsible Sourcing Commitment.

The ETI base code provisions, together with the International Labour Organisation (“ILO”) conventions (that they are based upon) are considered **Minimum Requirements** for working conditions within our supply chain.

As an established member of ETI we have committed to show a progressive approach to improving labour rights and conditions in our supply chains. Requirements of membership also include reporting annually on our progress with evidence based data.

For more details on the ETI and membership requirements: <http://www.ethicaltrade.org/about-eti/what-companies-sign-up-to>

### ETI Base Code

<p><b>Employment is freely chosen</b></p>	<p>There is no forced, bonded or involuntary prison labour.</p> <p>Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p> <p><b>(Please also see our section specifically on Modern Slavery and Human Trafficking prevention.)</b></p>
<p><b>Freedom of Association and the right to collective bargaining are respected</b></p>	<p>Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>
<p><b>Working conditions are safe and hygienic</b></p>	<p>A clean, safe and healthy working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.</p> <p>Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p> <p>Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>The company observing the code shall assign responsibility for health and safety to a senior management representative.</p>

<p><b>Child labour shall not be used</b></p>	<p>There shall be no new recruitment of child labour.</p> <p>Companies shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.</p> <p>Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>These policies and procedures shall conform to the provisions of the relevant ILO standards.</p> <p><b>Important:</b>  <b>Boden has a defined process for remediation when Child Labour is found within the supply chain. Please see appendix of this document.</b></p>
<p><b>Living wages are paid</b></p>	<p>Wages and benefits paid for a standard working week meet, <b>at a minimum</b>, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>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.</p>
<p><b>Working hours are not excessive</b></p>	<p>Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers.</p> <p>*Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p><b>Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*</b></p> <p>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. It shall not be used to replace regular employment. <b>Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</b></p> <p><b>The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.</b></p> <p><b>Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following are met:</b></p> <ul style="list-style-type: none"> <li>• this is allowed by national law;</li> <li>• this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> </ul>

	<ul style="list-style-type: none"> <li>• appropriate safeguards are taken to protect the workers’ health and safety; and</li> </ul> <p>the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</p> <p><b>*Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.</b></p> <p>* International standards recommend the progressive reduction of normal hours of work, when appropriate.</p>
<b>No discrimination is practiced</b>	There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
<b>Regular employment is provided</b>	<p>To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p>
<b>No harsh or inhumane treatment is allowed</b>	Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

## **Monitoring**

### **Open Access to Facilities**

Suppliers must provide full and open access to all facilities within the product supply chain. This must be granted for both Boden staff and any 3rd party representative that we have engaged to work on our behalf.

Suppliers must ensure that factories are transparent during the audit process and provide full and accurate records.

Suppliers must share full reports with Boden; follow up only/ corrective action reports alone will not be accepted.

### **Assessment Frequency**

First tier production sites must have an existing annual monitoring programme in place. Assessments/Audits must cover all elements of the ETI base code and must be conducted by an independent/ third party ethical audit firm. Audits are reviewed based on transparency and level of information provided. They are also reviewed on the quality of information gathered. Where information provided does not provide enough clarity Boden reserve the right to contact both the supplier and the auditing organization for further information.

Dependent on conditions at the manufacturing site follow up assessments, either desktop or a physical visit may be required to ensure progress is made on the facilities action plan. For due diligence processes Boden may also use alternate monitoring methods at any time to assess conditions within the supply chain.

## **New First Tier Production Sites**

If a site does not have an ethical assessment that meets Boden minimum assessment requirements, they must arrange a new assessment at Supplier's/Factory's cost. This may impact sign off process critical path.

## **Assessment Methodology**

SMETA ethical auditing protocol is our accepted monitoring standard. Any other audit methodologies will be reviewed on a case by case basis to help reduce the issues surrounding multiple audits and audit fatigue. We do not accept 1<sup>st</sup> or 2<sup>nd</sup> party audits for newly introduced (to Boden) sites (this includes brand conducted audits).

Assessments must be either unannounced or semi announced (with a minimum three-week window).

**We do not accept announced audits.**

Local/ International NGO/Multi-stakeholder assessments are accepted on a case by case basis dependent on protocol used.

Where a factory has an alternative monitoring system or a recognized functioning grievance mechanism in place and is able to share **significant** details of that programme or mechanism, Boden will review and accept as an alternative on a case by case basis.

Boden is increasing the use of alternative auditing methodologies and increasing the use of grievance mechanisms, suppliers and their supply chain production sites will be expected to engage fully with these processes as part of working with Boden.

## **Preferred Auditing Firms:**

UL  
Elevate  
SGS  
Intertek  
FWC (Fair Working Conditions)  
TAOS (China only)  
Verité

## **Sedex**

In October 2018, Boden joined Sedex to assist in our management of ethical audits and risk data that we collate on factories and the supply chain. All suppliers we work with will need to ensure that their production facilities are registered on Sedex system with completed SAQ and audits available.

## **Continuous Improvement and Engagement**

Where an existing supplier is not meeting the minimum requirements of the ETI base code we will support the supplier in developing an action plan with sensible timescales for improvements.

Collaboration is essential to drive sustainable supply chain improvements. We will always seek to work together with all interested parties including other brands and retailers to support the factory management team to ensure improvements are sustainable.

Each supplier should have at least one member of staff who has responsibility for managing ethical trade requirements centrally. All local staff working on Boden's account should be familiar with this document, and have an understanding of ETI base code requirements on working conditions, UK modern Slavery Act requirements, ILO conventions and local (country and regional) laws pertaining to employee rights and employer obligations.

Suppliers are expected to engage with all training opportunities provided, that pertain to the requirements of ETI base code, Modern Slavery legislation and any additional CSR initiatives.

## Modern Slavery and Human Trafficking Prevention

As part of our continued commitment to ensuring ethical working conditions in our supply chain and operations, we fully support the transparency in supply chains provision (Section 54) of the Modern Slavery Act focusing on the prevention of modern slavery and human trafficking.

The Modern Slavery Act takes the ETI base code provision of Forced Labour a step further to include the impacts of human trafficking.

In 2017, Boden published their first modern slavery statement this can be found on the sustainability section of our website and in the supplier manual.

Where source countries are at higher risk of prevalence of modern slavery and/or human trafficking conditions, suppliers must ensure that they have both processes and procedures in place to prevent and remediate where this issue may occur in their supply chains.

Boden fully supports the **Employer Pays principle** -

**“No worker should pay for a job - the costs of recruitment should be borne not by the worker but by the employer”**

**All suppliers working with Boden are expected to adhere to this principle.**

Please find more information about this principle on the Institute for Human Rights website <https://www.ihrb.org/employerpays/the-employer-pays-principle>

## Cotton Sourcing – Sustainable Sourcing and Traceability

In August 2018, Boden became members of the Better Cotton Initiative (BCI) as part of our commitment to source **100% more sustainable cotton** before 2025.

BCI's aim is to make the system of global cotton production better for both the people who produce it and for the environment the cotton grows in. BCI works with a wide range of stakeholders across the cotton supply chain to promote measurable and continuing improvements for the environment, farming communities and the economies of cotton-producing areas.

For more information on the Better Cotton Initiative <https://bettercotton.org/>

We are focused on gaining full traceability of our supply chains, which we will need suppliers support and co-operation. Suppliers must provide Boden with the COO of the cotton used in the fabric for production.

## Responsible Sourcing Network Cotton Pledges concerning Uzbekistan and Turkmenistan

In December 2018 we made the business decision to sign the Responsible Sourcing Network's cotton pledges to not knowingly source cotton from these regions due to state sanctioned forced labour. This public declaration is to strengthen the existing internal commitments made on prohibiting sourcing cotton from these regions. For more information on the cotton pledges.

<https://www.sourcingnetwork.org/the-cotton-pledge>

## **Homeworking**

Some Boden product will have elements of handcrafting. When working with either hand working units or homeworkers themselves, suppliers will be expected to share full and transparent supply chain information and must be able to demonstrate that they are implementing Boden's homeworker policy. Please find this in the appendix.

## **Young Workers (15-18) and Child labour**

We have developed a specific policy for the protection of young workers and the prevention of child labour within our factories. Please find this in the appendix.

## **Environment**

We expect all suppliers and factories that we are working with to ensure that they are meeting all legal requirements concerning environmental issues. We would encourage all suppliers and factories to develop an environmental management plan and policy for their working environments that encompasses both local legal requirements and seeks to meet and exceed international standards.

## **Chemical Management**

All suppliers are required to ensure that they do not exceed the limits set out in the Boden Restricted Substances List (RSL), which has been compiled using the most stringent limits from the laws and regulations in the countries that we trade in and industry imposed standards where these are lower.

## **Animal Welfare**

Where animals are involved in the supply chain for products, suppliers should ensure that industry recognised best practice standards are in place in their supply chain sources, to ensure animal welfare is safeguarded at all times.

## **Business Ethics and Bribery**

"Bribery blights lives. Its immediate victims include firms that lose out unfairly. The wider victims are government and society, undermined by a weakened rule of law and damaged social and economic development. At stake is the principle of free and fair competition, which stands diminished by each bribe offered or accepted."

Ministry of Justice guidance document <http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf>)

The offering, paying, soliciting or accepting of bribes or kickbacks, including facilitation payments, is strictly prohibited.

A bribe may involve giving or offering any form of gift, consideration, reward or advantage to someone in business or Government, in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribery can also take place where the offer or giving of a bribe is made by or through a third party, e.g. an agent, representative or intermediary.

Some examples of bribes **could be-**

engaging a local company owned by a member of the family of a potential customer, public or government official, or making facilitation payments (which are small payments or fees requested by government officials to speed up or facilitate the performance of routine government action (such as the provision of a visa or customs clearance)). Such payments are strictly prohibited. This is not an exhaustive list of possible bribes.

Suppliers, representatives and their employees must comply with all applicable anti-bribery and corruption laws. If no such anti-bribery or corruption laws apply or are of a lesser standard to that prescribed in the UK Bribery Act 2010, suppliers, representatives and their employees must adhere to the UK Bribery Act 2010.

Supplier’s representatives must complete compulsory Bribery training provided by Boden.

Suppliers shall have an anti-bribery and corruption policy in place and must ensure all relevant staff are trained on that policy and it should be posted clearly for all staff, in all languages spoken in their business.

**Business Ethics and Bribery continued**

Suppliers and representatives shall have in place anti-corruption and bribery procedures designed to prevent employees or persons associated with its business from committing offences of bribery or corruption. Suppliers and representatives will properly implement these procedures into their business and review them regularly to ensure that they are operating effectively.

**Please sign below to confirm your understanding and agreement to Boden’s Responsible Sourcing Commitment.**

**Factory name** .....

**Factory representative name and Signature** .....

**Factory Representative Job Title** .....

**Date**.....

**Supplier name** .....

**Supplier representative name and Signature** .....

**Supplier Representative Job Title**.....

**Date**.....

**Agent name** .....

**Agent representative name and Signature** .....

**Agent Representative Job Title**.....

**Date**.....

# Appendix

## Boden Homeworkers Policy

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Homeworking can provide an essential lifeline to people where traditional job opportunities are inaccessible to them. We have developed this policy that forms part of our responsible sourcing commitment to clarify our approach.

### Background

Homeworking can be a necessary part of the supply chain. In most instances homeworkers possess specialist skills required for specific products or components which cannot be replicated by machinery, or they may produce small quantities of intricate or high-quality items.

For a homeworker the opportunity to work from home can offer flexibility not met by traditional site-based work, balancing domestic and family commitments. For some cultures where it is not possible for women to work outside the home, homeworking offers a valuable opportunity of income.

Boden acknowledges the existence of homeworkers within the supply chain and is open and positive towards homeworking as part of the production process.

### Our Commitment

We acknowledge that monitoring and improving working conditions for homeworkers is a complex issue, and as part of this homeworker policy we commit to:

- Communicate our position on homeworking throughout our company, to those who supply to us, and those we supply to.
- Ensure that the presence of homeworkers in our supply chain will not lead to the relocation of work or cancellation of orders.
- Work with our suppliers for the sustainable improvement of labour conditions of homeworkers in our supply chain (we aim to do this by following the guidance set out in the ETI Homeworker Guidelines\*).

### Suppliers Commitment

We expect those we are sourcing from to:

- Adopt a shared policy of acceptance of homeworking and commitment to improving homeworkers' labour conditions.
- Share where homeworking occurs in their supply chain through mapping
- Communicate this policy to all those in the supply chain beneath them, **including homeworkers themselves**.
- Work with us to develop **an action plan** for improving conditions for homeworkers in their supply chain based on ETI base code and ETI homeworker guidelines.

## **Further support and guidance**

The ETI homeworker guidelines are designed to help retailers and suppliers to improve working conditions of homeworkers in the supply chain.

A full copy of the guidelines can be downloaded from the ETI website as follows:

<https://www.ethicaltrade.org/resources/homeworker-project-resource-downloads>

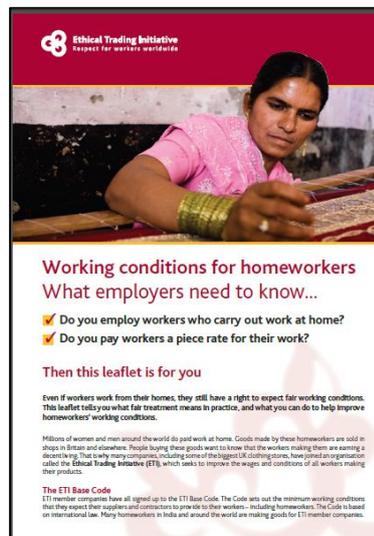
[https://www.ethicaltrade.org/sites/default/files/shared\\_resources/homeworker\\_guidelines\\_suppliers.pdf](https://www.ethicaltrade.org/sites/default/files/shared_resources/homeworker_guidelines_suppliers.pdf)

There is a wealth of information and guidance supporting these guidelines available on the ETI website including a number of case studies, tools for mapping homeworkers, training materials and the effect of purchasing practices. You can also read about our experience implementing the homeworker guidelines in India, available through the **case studies** section.

The ETI has developed this leaflet for suppliers and contractors working with homeworkers, detailing the working conditions homeworkers should expect and actions that the suppliers and contractors can take.

Please see link to download:

[https://www.ethicaltrade.org/sites/default/files/shared\\_resources/hw\\_leaflet\\_for\\_contractors\\_4\\_pages\\_july\\_2010.pdf](https://www.ethicaltrade.org/sites/default/files/shared_resources/hw_leaflet_for_contractors_4_pages_july_2010.pdf)



If you have any concerns or questions regarding anything in the policy, or would like to talk further about homeworking/ supply chain mapping, please contact Boden's Ethical Trade Manager – Francesca Williams at [ethicaltrade@boden.co.uk](mailto:ethicaltrade@boden.co.uk)

## **References, Links and further reading**

ETI base code - <http://www.ethicaltrade.org/eti-base-code>

ILO convention on Homeworking -

<http://www.ethicaltrade.org/sites/default/files/resources/Homework%20Convention.pdf>

Home Workers Worldwide resources- <http://www.homeworkersww.org.uk/>

# Boden Young Worker and Child Labour Policy

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## Background

**“Child labour in its many forms deprives children of their childhood, their dignity and their rights.”**

Even though laws and standards are in place to eliminate child labour, it is still a serious issue around the world, affecting over 168 million children at current ILO estimates.

The main factors impacting global child labour are poverty, limited access to education, repression of workers’ rights, and limited enforcement of child labour laws. Most commonly found in agriculture and domestic service, it is still found in some manufacturing industries.

It is most often found in the informal economy and further down the supply chain where monitoring and traceability can be problematic.

This policy is in place to support all suppliers working with Boden to understand in more depth our commitment to ensure **child labour is not used in supply chains** producing Boden product. We believe a right to a childhood and to an education is fundamental. In line with the core principles as set out in the **ETI base code (1)**, the **United Nations International Labour Organisation’s conventions No 182 and 138** relating to child Labour(2), and the **UN Convention on the Rights of the Child (3)**

## Definitions

**A child** as defined by the 1989 UN Convention on the Rights of the Child (3) is a person under 18 years of age.

**Child Labour** is defined as the recruitment, hiring and employment of workers under the legal minimum working age or the age of 15, whichever is higher, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child’s or young person’s education, or to be harmful to the child’s or young person’s health or physical, mental, spiritual, moral or social development.

**Young Worker** is defined as the employment of workers under 18, that are over the legal minimum working age or the age of 15, whichever is higher.

## Young Worker Policy

Workers who fall under the young labour definition can be employed when all necessary protections are in place, and where a young worker risk assessment has been conducted prior to the individual starting work, to ensure the role and working environment meets requirements.

Young workers **must not** be employed in **hazardous work, carry out overtime or work at night**.

All **local legal requirements** must be followed including health examinations and government registration where applicable.

Suppliers must ensure that **all sites** that are producing and/or involved in the process of making a Boden product have an effective and robust recruitment system that involves verification checks on an employee’s age and maintains copies of official documentation in personnel files to support this.

**Suppliers must not allow children under the age of 15 or the local legal working age (whichever is higher) into production/ warehouse areas under any circumstances.**

### **Child Labour Remediation**

If child labour is discovered in any part of the Boden supply chain it is important that **immediate action** is taken to protect the child. We have adopted the Impactt Operational Procedures for the Remediation of Child Labour.

Boden will work in partnership with the supplier and the local remediation team (of suitably qualified expertise) to develop a remediation plan that ensure the best interests of the child involved and to assist the factory in developing their HR operations to ensure that this situation can be prevented in the future.

**We have detailed the main activities below.**

#### **Immediate actions required**

- Remove the child from all work immediately
- Boden's Ethical Trade Manager must be informed immediately
- Supplier/ factory to obtain contact details of child and parents/guardian and liaise with them through the process
- Free food and free and safe accommodation shall be provided until a remediation programme is operational
- Talk to the child to understand their needs and seek their agreement to participate in the remediation programme
- During development of remediation plan, the site must continue to pay wages to the child

#### **Remediation design and implementation**

- Team in place and remediation plan developed involving all stakeholders
- Agreement of who will fund the remediation costs
- Commitment from the supplier/site to re-hire the child when he or she reaches legal working age, should the child and parents wish it
- Consulting with the parent/guardian of each child in the design of the specific remediation programme for each child
- Obtaining signed agreements from the parent/guardian and all parties to the remediation programme
- Once remediation plan in place-ongoing monitoring to ensure child's welfare

If you have any concerns or questions regarding anything in the policy, or around the issues, please contact Boden's Ethical Trade Team at [ethicaltrade@boden.co.uk](mailto:ethicaltrade@boden.co.uk)

#### **References and Links**

- <http://www.ethicaltrade.org/eti-base-code/child-labour>
- <http://www.ilo.org/ipec/facts/ILOconventionsonchildlabour/lang--en/index.htm>
- <http://www.unicef.org/crc/>
- <http://www.dol.gov/ilab/reports/child-labor/list-of-goods/>