

Boden

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.

This Responsible Sourcing Commitment has full sign off by Boden's Global Chief Product Officer and Executive Board.

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 on boarding process.

Where supply chain changes are necessary, suppliers must inform the product teams (Garment Tech, Buying and Responsible Sourcing) within a reasonable timescale ahead of production commencing.

Subcontracting

Boden is 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 prior agreement with both Buying and Garment Tech. Suppliers are required to monitor approved subcontractors for social and environmental responsibility.

Strategic introduction of new subcontracting routes (sewing units) will require Buying approval, agreement at style level to be with the relevant Garment Tech. The PLM system is being improved to be able to log these agreements in one central location.

Subcontracting includes any part of production happening outside the main factory including but not limited to: sewing; garment dyeing; washing; printing; packing; embroidery & embellishment; beading; crochet; hand knitting; homeworking; plating and packing. Documentation of subcontractors is to be extended to all units as well as sewing facilities.

Fairer Work Places and Human Rights

The people who make Boden clothing are at the centre of our responsible sourcing 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. Boden are committed to respecting human rights in line with the guidance of the [United Nation's \(UN\) Guiding Principles on Business and Human Rights](#). The Guiding Principles seek to provide an authoritative global standard for preventing and addressing the risk of adverse human rights impacts linked to business activity. In accordance with these principles, it is Boden's responsibility to act with due diligence to avoid infringing on the human rights of others in our supply chain or operations. Further, we are responsible for addressing adverse impacts of our supply chain. Boden is committed to working collaboratively to protect and respect human rights.

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.

For more details on the ETI and membership requirements: <https://www.ethicaltrade.org/join-eti>

ETI Base Code

1. Employment is freely chosen

- 1.1 There is no forced, bonded or involuntary prison labour.
 - 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.
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2. Freedom of association and the right to collective bargaining are respected

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

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
 - 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
 - 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
 - 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
 - 3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.
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4. Child labour shall not be used

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

5. Living wages are paid

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

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
 - 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*
 - 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
 - 6.4 The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
 - 6.5 Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following are met:
 - this is allowed by national law;
 - this is allowed by 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.
 - 6.6 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 fourteen-day period.
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7. No discrimination is practiced

- 7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

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

9. No harsh or inhumane treatment is allowed

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

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 third-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 audit reports with Boden; follow up audits and/or corrective action plan reports will not be accepted in lieu of full audit reports.

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.

Where audits do not provide enough clarity, Boden reserve the right to contact both the supplier and the auditing organisation for further information.

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

New First Tier Production Sites

If a site does not have an ethical assessment that meets Boden's minimum assessment requirements, they must arrange a new assessment at their own cost. This may affect the time taken for on boarding.

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 audit fatigue. We do not accept first or second party audits for newly introduced sites. This includes brand-conducted audits. As Boden's commitment to sustainability grows, it's vital for us to measure and monitor the environmental impact of our supply chain, for this reason we are requesting that suppliers move towards a 4 Pillar SMETA methodology by the end of 2022.

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

Boden does not accept announced audits.

Local, international NGO and multi-stakeholder assessments are considered on a case-by-case basis.

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

Boden is increasing the use of alternative auditing methodologies and grievance mechanisms. It is an expectation of working with Boden that suppliers and their supply chain will engage fully with these processes.

Preferred Auditing Firms:

Our preferred auditing firms are listed below:

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

Sedex

Boden are members of Supplier Ethical Data Exchange (Sedex), and use the platform to manage ethical auditing and risk management of the supply chain. All suppliers we work with will need to ensure that their production facilities are: registered on Sedex system; linked to Boden; have completed the self-assessment questionnaire (SAQ) in full; and uploaded their ethical audits.

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 agreed 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 offered in our responsible sourcing programme.

Modern Slavery and Human Trafficking Prevention

Boden 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.

Boden's Modern Slavery Statement can be found on the homepage of our website.

Where source countries are at higher risk of modern slavery, suppliers must ensure that they have processes and procedures in place to prevent and remediate where issues 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"

It is an expectation that suppliers working with Boden adhere to this principle.

Please find more information [about this principle](#) on the Institute for Human Rights website.

Cotton Sourcing - Sustainable Sourcing and Traceability

Boden are members of the Better Cotton Initiative (BCI) as part of our commitment to source 100% more sustainable cotton by 2023.

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, see [Better Cotton Initiative](#).

We are focused on getting full transparency of our supply chains; this will require full support and cooperation from our suppliers. In all cases, we endeavour to have transparency as far down the supply chain as possible.

We work with our trusted manufacturing partners in China who are ethically audited on an annual basis using the SMETA audit methodology. We do not work with any suppliers or factories in the Xinjiang Uyghur Autonomous Region or (knowingly) source materials from the region either. We are aware of the on-going situation and are

talking to people like the Ethical Trading Initiative to ensure supply chains in China are free of any forced labour, as we do with all our suppliers around the world.

Responsible Sourcing Network Cotton Pledges concerning Uzbekistan and Turkmenistan

Boden are signatories of Responsible Sourcing Network's cotton pledges to not knowingly source cotton from these regions due to state sanctioned forced labour. For more information on the cotton pledges, [see this link](#).

Homeworking

Some Boden products 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.

Forced Labour 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 to ensure that they are meeting all legal requirements concerning environmental issues. We 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 Supplier Manual. This includes, but is not limited to, Boden's Restricted Substances List (RSL). Both the Supplier Manual and RSL have 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

Boden believes that all animals should be treated humanely. Any animal derived product used in Boden products should be borne of animals treated in accordance with high standards of animal welfare.

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

Animals should not be harmed during farming or collection of hair, this includes: wool, cashmere, alpaca and yak

- No Boden products have used natural shell products since 2010
- No Boden products have contained angora since 2011
- No Boden products are sourced from endangered species listed in CITES (Convention on International Trade in Endangered Species)
- No Boden products use real exotic fur
- From 2020 no Boden products have contained feather or down.
- Boden does not use any animal product obtained by live skinning, boiling or plucking
- Leathers must only be a bi-product of the food industry; no animal should be slaughtered for its skin. Boden requires humane slaughter with high animal husbandry in accordance with the animal welfare standards set by the OIE in their Animal Health Codes
- No Boden products use Astrakhan/Karakul or any other leather/skin products which are the product of unnatural abortions
- Boden is a member of the Good Cashmere Standard (GCS). Boden's cashmere comes from known farms, these are visited regularly by our cashmere supplier who follows Sustainable Fibre Alliance (SFA), Cashmere and Camel Hair Manufacturers Institute (CCMI) and GCS guidelines for animal husbandry, farmer welfare and environment protection
- Currently 90% of the wool we use is non-mulesd.

Business Ethics and Bribery

Bribery perpetuates a system of corruption that embeds poverty and inequality. Corruption is considered the single greatest obstacle to economic and social development across the world. This is why countries have gone to great lengths to outlaw bribery and corruption, including the [UK Bribery Act 2010](#).

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](#).

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 in exchange for a reward, advantage or gift.
- 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 are expected to 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.

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

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 that cannot be replicated by machinery, or they may produce small quantities of intricate or high-quality items.

For a homemaker 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 homemaker 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 Homemaker 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 homemaker guidelines.

Further support and guidance

The [ETI homemaker guidelines](#) are designed to help retailers and suppliers to improve working conditions of homeworkers in the supply chain.

The [ETI homemaker guidelines](#) and [supplier guidelines](#) are publicly available resources from ETI website.

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 homemaker 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.

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 Responsible Sourcing and Compliance Manager responsiblesourcing@boden.co.uk

References, Links and further reading

- [ETI base code](#)
- [ILO convention on Homeworking](#)
- [Home Workers Worldwide resources](#)

Boden Young Worker and Child Labour Policy

Background

Even though laws are in place to eliminate child labour, it remains a serious issue around the world, affecting over 160 million children at current ILO estimates.

The main factors affecting 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, child labour 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, the United Nations International Labour Organisation's conventions No 182 and 138 relating to child Labour, and the UN Convention on the Rights of the Child.

Definitions

A child as defined by the 1989 UN Convention on the Rights of the Child 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 or young person's education, or to be harmful to the child 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 worker 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 be 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 Responsible Sourcing and Compliance 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 the remediation plan is in place, ongoing monitoring to ensure the child's welfare

If you have any concerns or questions regarding anything in the policy, or around the issues, please contact Boden's Responsible Sourcing Team at responsiblesourcing@boden.co.uk

References and Links

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