

# PRINCESS POLLY

# CODE OF CONDUCT

Princess Polly's Code of Conduct lays out the expectations Princess Polly has of its suppliers. It is based on internationally accepted labor standards, including the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights, and sits under the Princess Polly Human Rights Policy. Suppliers are expected to execute and monitor the following standards and ensure they apply them to their own suppliers and subcontractors do the same.

We ask suppliers to fully respect national law or international standards, depending on which offers the greatest protections to workers and the community. Where the expectations below exceed what is required by law, these must be met in addition to legal compliance.

The expectations laid out in our Code of Conduct are expected to resonate with all suppliers, and support the maintenance of spaces that are **respectful, safe and sustainable**, and operated with **integrity**. Meeting and exceeding these standards, therefore demonstrating a true commitment to social responsibility and sustainability, is a core factor in determining which suppliers Princess Polly will continue to grow our business with.

In order to effectively build strong partnerships, Princess Polly expects transparency from suppliers if breaches occur. We will educate and work with suppliers to improve their ways of working to meet this Code. However, we will consider terminating a relationship with a supplier if they demonstrate a structural failure to engage proactively in mitigating the risk or remediation of violations, with specific attention placed on child labour, forced and bonded labour, and any immediate risk to the life or limb of workers. It is only in this way that the most vulnerable people in our supply chain can be protected, our responsibilities be upheld and our due diligence to respect human rights be effective.

## OUR EXPECTATIONS

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### RESPECT

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#### EMPLOYMENT PRACTICES

- The Employer must make every effort possible to provide regular, secure employment. All national laws are respected with regards to terms of employment, and there is no exploitation of loopholes to offset legal responsibilities, for example through the abuse of temporary workers, contract labour, apprenticeship schemes or repeated use of fixed-term contracts.
- All workers are provided with and sign contracts in a language they understand before they start employment. Only workers that possess a valid work permit shall be hired.
- Migrant workers, foreign contract workers and workers hired through agencies shall have exactly the same entitlements as local employees.
- No home working arrangements are used.

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#### MODERN SLAVERY

- All work is voluntary and any slave, forced, bonded or involuntary prison labour, forced overtime, withholding of identity documents, restrictions on movement or any other coercion or constraint is strictly prohibited.
- Workers must never pay for work, at any stage of their recruitment or employment journey, or be indebted to work.

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#### CHILD LABOUR

- Work by children under the age of 15 is strictly prohibited, unless exceptions recognised by the ILO Convention 138 apply. Where national laws specify a higher age for completing mandatory schooling or beginning full time work, the highest age is applicable.
- Age verification systems are implemented
- Young workers under 18 are not employed in hazardous conditions, such as the use of dangerous machinery, equipment and tools, manual handling of heavy loads, exposure to hazardous substances, temperatures or noise levels, overtime, and night work.

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#### FREEDOM OF ASSOCIATION

- The right to join or form trade unions and bargain collectively is respected without interference, discrimination or penalisation from management.
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- Where the right to freedom of association and collective bargaining is restricted under local law, the supplier allows the development of alternative forms of independent and free representation and bargaining.
- Worker representatives are democratically elected and support is provided in order to carry out their functions. Support is also provided to independent informal collectives established to represent a vulnerable group

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#### WAGES

- All workers are provided with clear contracts establishing wage conditions before they begin work, including payment amounts, schedules, benefits and incentives.
- Take-home wages meet, at a minimum, local legal minimum wage standards, mandated benefits and overtime rates.
- Wages should be sufficient enough to meet the basic needs of workers alongside discretionary income. Princess Polly supports the payment of a Living Wage.
- All workers, regardless of gender, will receive equal pay for work of equal value.
- Workers are paid their wage in full, in a timely manner, no less than monthly, and are provided with payslips showing how the remuneration has been calculated.
- All women are entitled to maternity protection, including maternity leave and benefits.
- No deductions from workers' wages are made aside from those allowed by national law.

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#### WORKING HOURS

- Working hours must always comply with national law and collective agreements, and must not exceed 48hrs regular working hours and 12hrs overtime per week.
- All overtime should be voluntary, compensated at a premium rate and not requested on a regular basis.
- All workers receive one day's rest in every seven days, or two in every fourteen days, as well as paid public and annual holidays.

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#### EQUALITY, RESPECT AND DIGNITY

- There is no discrimination in any form on the basis of race, ethnicity, religion, age, gender, marital status, sexual orientation, union membership, political affiliation, (dis)ability, nationality, class, and/or caste. This includes recruitment, termination, wages, working hours, access to promotions, discipline, training opportunities or other workplace benefits.
- Harsh or inhumane treatment will not be tolerated. There is no bullying, intimidation, abuse or harassment on site be it physical, verbal, sexual or psychological.
- Corporal punishment or any other form of physical or psychological coercion will not be tolerated.
- Women are supported in their right to a family. Pregnant women remain safe in the workplace, suffer from no unlawful reduced hours or wages. Princess Polly supports the provision of child care or flexible hours for workers with families.
- Pregnancy or medical tests and the use of contraception will not be required and can't be a condition of hiring or employment.

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### **SAFETY**

#### HEALTH & SAFETY

- Healthy, hygienic and safe conditions are provided for workers at all work and residential sites. Residential accommodation must be separated from production.
  - All buildings are fit for purpose and comply with national laws and regulations related to fire, machinery, electrical and structural safety. Inspection records for potentially dangerous equipment must be up to date.
  - Management systems are in place to prevent injury, accidents and disease, including the regular assessment and mitigation of risks.
  - Any risks to life and limb, particularly in relation to fire, building or chemical safety, is prioritised and addressed immediately.
  - All workers receive regular health and safety training.
  - Women have access to adequate, private sanitary facilities
  - Adequate medical assistance and facilities are provided and there are sufficient workers trained to be first aiders and fire safety officers on site.
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- Potentially dangerous activities are minimized, and where possible replaced by less dangerous ones.
- Workers in hazardous roles are identified and trained thoroughly, as well as provided with regular medical check-ups and communication to ensure they understand the hazards of these roles.
- Appropriate and regularly reviewed Personal Protective Equipment (PPE) is provided to workers free of charge, and workers are trained in its use.
- Vulnerable workers, including pregnant women and young workers, must be further protected and steps taken to ensure they do not work in dangerous conditions.
- All waste, but particularly hazardous waste, is kept to a minimum and disposed of in appropriate ways and by licensed companies or professionals.

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## **SUSTAINABILITY**

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### *ENVIRONMENT*

- All required environmental permits and licences must be kept up to date.
- Sites have effective and transparent environmental management systems in place.
- Waste is minimised, and where possible, reused.
- Challenging targets for environmental improvements are set, including water, air and soil pollution, carbon emissions and solid and hazardous waste disposal.

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### *RAW MATERIALS AND PROCESSING*

- All inputs to production are responsibly sourced, and the supplier and origin's are monitored and recorded. Specifically, cotton from Uzbekistan, Turkmenistan and Xinjiang is strictly prohibited.
- All inputs comply with Princess Polly's Restricted Substance List and Animal Welfare Policy and the use of Earth Club materials is greatly preferred.
- All subcontracted and processing sites are monitored and recorded. Processes that reduce water, energy and chemicals should be prioritised.

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## **INTEGRITY**

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### *LAND RIGHTS*

- In the context of indigenous peoples' rights, free, prior and informed consent (FPIC) is seriously considered and implemented following best practice guidance, with records maintained to demonstrate good faith.
- Where FPIC does not apply but communities may still be affected, the basic principles of FPIC are implemented, including transparent processes, full disclosure, consultation and fair opportunities to benefit from economic development.

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### *GRIEVANCE MECHANISMS AND WHISTLEBLOWING*

- Appropriate, fair, confidential and well understood grievance mechanisms are implemented with quick feedback loops and maintained records.
- There is a whistleblowing system in place with no retaliation against anyone who makes a good faith report of any alleged violations.

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### *COMPLIANCE*

- Any process or production carried out for Princess Polly branded products, including tier two subcontracted processes, must be completed at an approved site.
- There is a functioning monitoring system and records are maintained for all legally required benefits as well as the benefits stipulated in this code and international norms, including pay and hours records, attendance documents and production records, as well as CCTV records and personnel documents.
- Princess Polly does not accept any form of corrupt practices including, but not limited to: extortion, fraud, or bribery.

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### *INSPECTION*

- Princess Polly reserves the right to request proof of compliance against this Code and conduct verification checks of suppliers and their subcontractors. This may include unannounced visits by Princess Polly representatives or nominated third parties.
- During an inspection by Princess Polly or a third party, access will be facilitated and all information and records will be provided.
- Princess Polly expects and requires full transparency, both positive and negative. There is an understanding that fake records are worse than genuine records, whether or not fake records hide breaches of the law, international standards and/or stipulations outlined in this document.

Ultimately, Princess Polly strives to build a strong, reliable and long-term supply chain with all its suppliers as partners, with a view to continuously improve conditions for all. Success can be achieved only when we ensure everyone, both within and outside our company, is safe, healthy and happy.