

CODE OF CONDUCT FOR PRODUCTION PARTNERS

At CHARLES & KEITH Group (herein referred to as CHARLES & KEITH) integrity, respect and openness are not only a part of our values, they guide us in building long-term relationships and trust with our customers, employees and business partners. We expect all our Production Partners to be accountable, and to uphold legal and ethical standards so that our products are made in a socially and environmentally sustainable way. Production Partners refer to the suppliers and manufacturers who provide us with goods and/or services throughout our supply chain.

The CHARLES & KEITH Group Code of Conduct for Production Partners specifies what we require from manufacturers, suppliers, contractors and subcontractors who provide CHARLES & KEITH with goods and/or services. It outlines the **MINIMUM CONDITIONS** for CHARLES & KEITH to either start or maintain business relationships, as well as monitor and evaluate our Production Partners for their compliance to these standards through our verification and monitoring program.

1. DUE DILIGENCE AND RISK MANAGEMENT IN THE SUPPLY CHAIN

CHARLES & KEITH is aware that certain areas of the supply chain are at higher risk for trafficking, modern slavery, and other human rights violations. CHARLES & KEITH has implemented a due diligence and risk management approach in the supply chain. The standards set out in this Code are a result of this approach.

2. LEGAL REQUIREMENTS

The CHARLES & KEITH Group Code of Conduct for Production Partners is based on internationally recognized standards such as the Universal Declaration of Human Rights, the ILO core Conventions, and, local/national legislation. In general, all our Production Partners must follow the national law in the countries or territories in which they operate. In some cases, CHARLES & KEITH's requirements may go beyond the requirements set out in national law. In an effort to ensure the greatest protection for workers and the environment, the stricter standard shall apply.

3. TRANSPARENCY AND HONESTY

Production Partners are required to be **transparent** and **honest** and to keep CHARLES & KEITH informed of all practices related to production. This includes, but is not limited to, the use of subcontractors, third parties and homeworkers, as well as disclosure of their locations. The CHARLES & KEITH Group Code of Conduct for Production Partners

should be communicated to all employees and displayed in local language in an accessible location.

Business shall be conducted in an ethical manner, free of bribery, corruption, and conflict of interest. We expect our Production Partners to provide accurate and truthful information and not to mislead anyone involved with our supply chain development work with falsified or forged documentation.

4. FORCED LABOUR AND MODERN SLAVERY

CHARLES & KEITH opposes forced labour and modern slavery in all parts of its organisation and supply chains. More specifically, CHARLES & KEITH does not allow any form of human trafficking, involuntary labour, prison labour, indentured labour, and/or bonded labour. Worker identity documents should never be retained by Production Partners and employees should never be required to make any kind of “deposit” for employment.

(ILO Conventions 29 and 105)

5. CHILD LABOUR

In no instances shall child labour be used. Employees of any Production Partner shall be at least 16 years of age, or meet the minimum age established by local law, whichever is greater. Persons between the ages of 16 and 18 years will be considered ‘young workers’ and shall not work during night hours or in hazardous conditions. Production Partners are required to take preventative measure to ensure that they do not hire anyone below the legal age of employment.

(ILO Conventions 138, 182 and 190)

6. DISCIPLINARY PRACTICES

All employees shall be treated with dignity and respect, employed in an environment free of sexual, racial and psychological harassment. Under no circumstances do we accept or permit the use of physical punishment, verbal or power abuse, or any other form of harassment or intimidation. In no situation should an employee be penalized through wage deductions or monetary fines.

7. NON-DISCRIMINATION

Production Partners are required to conduct recruitment, hiring, compensations, promotions, retirements, and terminations without discrimination based on race, nationality, caste, religion, disability, gender, sexual orientation, pregnancy, political affiliations, age, or any other protected status.

(ILO Conventions 111)

8. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

To the extent permitted by the laws of the manufacturing country, all employees have the right to join associations of their choosing and bargain collectively without harassment, interference or retaliation.

(ILO Conventions 87, 98, and 135)

9. WORKING HOURS, WAGES AND BENEFITS, CONTRACTS

Production Partners will manage the working hours of their employees within what is stipulated by local and national law. As a rule of thumb, total working hours, inclusive of voluntary overtime hours, shall not exceed 60 hours per week in any consecutive 7-day period. Employees are entitled to at least one day off in every 7-day period.

On top of the payment of legally mandated benefits and compensation of the manufacturing country, all Production Partners are required to pay, at the very least, the statutory minimum wage, the prevailing industry wage, or the wage negotiated through collective bargaining mechanisms, whichever is higher. Wages shall be paid on time and remunerated with the correct premiums for any voluntary overtime work. Employees have the right to clearly written and detailed accounts of how their wage was calculated for that given payment period.

Formal employment relationships shall be established and employees have the right to a written employment contract in local language, indicating their legal rights and obligations. Migrant workers shall be entitled to the same contracts as local employees and recruitment fees shall be borne by the Production Partner.

(ILO Conventions 1, 14, 26 And 131)

10. WORKPLACE HEALTH AND SAFETY

Employee and worker safety of all Production Partners should be a top priority in all areas of the production floors, canteens, and dormitories. Minimum conditions of light, ventilation, noise monitoring, and hygiene shall be met, and employees must have access to clean and adequate toilet facilities and drinking water. Structural, electrical and fire safety measure shall be in place, and everyone working on the premise shall be regularly trained on maintaining a safe and healthy working environment.

11. BUILDING SAFETY

Production Partners are expected to ensure that all buildings and constructions where operations are taking place are safe and inspected routinely.

12. ENVIRONMENT

Production Partners are expected to manage the environmental impacts of their operations and comply with all the applicable environmental laws and regulations of the manufacturing country. These include, but are not limited to, relevant environmental permits, handling of chemicals, air emissions, wastewater treatment, and waste management.

13. SYSTEMS APPROACH

To ensure compliance to the CHARLES & KEITH Group Code of Conduct for Production Partners, as well as the local labour and environmental laws of the manufacturing country, Production Partners must establish clear policies and procedures and appoint a member of management responsible for the enforcement of this Code.

Any and all inquiries or cases of non-compliance with the CHARLES & KEITH Group Code of Conduct for Production Partners should be reported to CHARLES & KEITH Group immediately: Sustainability@charleskeith.com