

Ethical Policy

1. Introduction

Premier Clothing Ltd (“Premier”) strives to conduct business to the highest ethical and environmental standards seeking to use and utilise manufacturers that do the same. Premier has its own detailed code of conduct, which is integral to its business and that all suppliers and their sources must adhere to. Premier’s code of conduct is based on current best practices with regard to employment ethics, health and safety practices and environmental practices; so that when a customer purchases our goods, they know that they have been produced under acceptable conditions. That means that the goods must have been produced:

- lawfully, through fair and honest dealing.
- without exploiting the people who made them.
- in decent working conditions.
- reducing the environmental impact during production and transportation.

Premier has the right to run audits and spot checks by themselves or by external parties on premises without their prior knowledge to verify that they are behaving in an appropriate manner. Third party audits are also carried out by independent bodies such as BSCI, WRAP and SMETA

2. Employment

All suppliers must meet the local laws on conditions such as minimum wages, hours of work, overtime, and deductions. Or, where determinable the prevailing industry wage for the type of work involved. (International Labour Organisation (ILO) Conventions 1, 26, 95,131 and Recommendation 85)

The Company’s Anti-Slavery and Human Trafficking Policy will be communicated across the organisation. The Policy will be included in the Employee Handbook issued to all new starters. Key members of staff will be trained in all aspects of the Anti-Slavery and Human Trafficking Policy.

3. Employing children

Premier does not condone the use of child labour and our suppliers must not employ children, other than under the ILO Convention 138 and Recommendation 146. Premier does support legitimate, legally sanctioned, apprentices and educated-related work as long as the child is not being exploited, there is no risk to the child’s health, education and development, and you have the permission of the child’s parents. (Article 32 of the United Nations Convention on the Rights of the Child)

4. Forced Labour

Forced labour, whether in the form of prison, bonded or uncompensated labour is not used. People are not forced to work for our suppliers by threatening them with a penalty. (ILO Conventions 29 and 105, Recommendation 35).

5. Disciplinary practices

Every employee must be treated with respect and dignity. No employee is treated with threatening behaviour, physical punishment or any form of mental or verbal abuse.

6. Non-Discrimination

Premier suppliers employ and deal with all their employees fairly and without discrimination. (ILO Convention 100 and 111 and Recommendation 90 and 111) This is regardless of age, sex, race, religion or disability.

7. Freedom of Association

Suppliers acknowledge that employees have the right to associate or unionise with any organisation that is legal in that country (ILO Convention 87).

8. Health, safety, and welfare

Premier's suppliers all provide a safe place of work, meeting all local laws relating to health, safety and welfare in the workplace. This means:

- Every effort is made to prevent accidents or injury.
- Health and safety procedures are implemented, and employees are regularly trained and tested in what to do in certain situations.
- There is always adequate lighting and ventilation; and clean drinking water is always available

9. Environment

Premier is continuing to develop its environment practices both in the production of the garments, the choice of fabrics used and the Premier working environment. Key examples of these procedures are:

• Garment production

All companies comply with the EU general Product safety Directive 2001/95 EC. Premier suppliers comply with the requirements of the Azo dye directive and Nickel directives meaning that no Dangerous substances and Preparations are used during the manufacturing of any of its garments. Premier is constantly working to minimise the waste fabric during production operations.

• Fabrics

Premier is working towards all the range carrying the OEKO-TEX Standard 100 'Confidence in Textiles' certification which promotes the use of environmentally friendly materials and manufacturing methods. This also ensures conformity to the European Directive relating to Azo colourants. Any products displaying the OEKO-TEX Standard 100 'Confidence in Textiles' logo mean that they are fully certified as OEKO-TEX® Standard 100 products.

• The Azo Dye Directive EU Directive 2002-61-EC, and subsequent amendments

This directive covers those Azo dyes, which are degradable to carcinogenic aryl amines, and is applicable to Textiles and Leather used in finished articles or their dyed parts, which may come into direct and prolonged contact with the human skin or oral cavity.

National Laws implementing the new directive restrict azo-colourants (dyes) in textiles and leather, replacing current restriction in Germany, Austria and the Netherlands. (The German and Austrian requirements for Azo-pigments will be retained, as they are not covered under this directive.)

The requirements of the directive will be enforced by trading standards authorities, who will expect the retailer and supply chain to be able to demonstrate due diligence with respect to their enforcement of the requirements.

Their expectations may extend beyond a paper trail, to a requirement for random spot checks on actual product.

10. When engaging in business we always conduct a full factory audit and anyone working with us must adhere to Premier's own detailed code of conduct, which is integral to its business and that all suppliers and their sources must adhere to. Premier's code of conduct is based on current best practices with regard to employment ethics, health and safety practices and environmental practices which include conforming to the Azo Dye Directive EU Directive 2002-61-EC; so that when a customer purchases our goods they know that they have been produced under acceptable conditions. That means that the goods must have been produced:

- Lawfully, through fair and honest dealing.
- Without exploiting the people who made them.

- In decent working conditions.
- Reducing the environmental impact during production and transportation.
- All dyes comply to EU regulations with regard to harmful dyes

11. Head Office recycling

- Toner cartridges from laser printers are returned to the manufacturer for recycling.
- All cardboard waste from the warehouse is recycled.
- Premier is working towards all their plastic bags carrying recyclable logos. (see our packaging policy)
- Use of environmentally friendly office consumables where possible.
- Collection point for office staff to recycle paper.
- Email is our preferred method of communication to reduce the amount of paper used.

12. Independent Verification

Premier insists that our factories have one or more of the following audits.

WRAP (Worldwide Responsible Accredited Production)

BSCI (Business Social Compliance Initiative)

SMETA (Sedex Members Ethical Trade Audit)

12.1 WRAP

WRAP is an independent, objective, non-profit team of global social compliance experts dedicated to promoting safe, lawful, humane, and ethical manufacturing around the world through certification and education. The 12 principles of WRAP are as follows:-

- **Compliance with Laws and Workplace Regulations** Facilities will comply with laws and regulations in all locations where they conduct business.
- **Prohibition of Forced Labour** Facilities will not use involuntary, forced, or trafficked labour.
- **Prohibition of Child Labour** Facilities will not hire any employee under the age of 14 or under the minimum age established by law for employment, whichever is greater, or any employee whose employment would interfere with compulsory schooling.
- **Prohibition of Harassment or Abuse** Facilities will provide a work environment free of supervisory or co-worker harassment or abuse, and free of corporal punishment in any form.
- **Compensation and Benefits** Facilities will pay at least the minimum total compensation required by local law, including all mandated wages, allowances & benefits.
 - **Hours of Work** Hours worked each day, and days worked each week, shall not exceed the limitations of the country's law. Facilities will provide at least one day off in every seven-day period, except as required to meet urgent business needs.
 - **Prohibition of Discrimination** Facilities will employ, pay, promote, and terminate workers on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs.
 - **Health and Safety** Facilities will provide a safe and healthy work environment. Where residential housing is provided for workers, facilities will provide safe and healthy housing.
 - **Freedom of Association and Collective Bargaining** Facilities will recognize and respect the right of employees to exercise their lawful rights of free association and collective bargaining.
 - **Environment** Facilities will comply with environmental rules, regulations, and standards applicable to their operations, and will observe environmentally conscious practices in all locations where they operate.
 - **Customs Compliance** Facilities will comply with applicable customs laws, and will establish and maintain programs to comply with customs laws regarding illegal transshipment of finished products.

- **Security** Facilities will maintain facility security procedures to guard against the introduction of non-manifested cargo into outbound shipments (i.e., drugs, explosives biohazards and /or other contraband).

12.2 BSCI

In 2003, **amfori** BSCI was established by the Foreign Trade Association (FTA) to create consistency and harmonisation for companies wanting to improve their social compliance in the global supply chain. Amfori BSCI aims to establish a common platform for the various European companies Codes of Conducts and monitoring systems, it also lays the groundwork for a common monitoring system for social compliance. The experience and the know-how gained by companies and associations from their monitoring systems were the foundations of the amfori BSCI approach and management instruments. In 2004 the development phase was achieved, and the system has since been implemented worldwide. The goals for the amfori BSCI code of conduct are as follows:-

- Freedom of association and the right to collective bargaining are respected.
- No discrimination is practised
- Child Labour is prohibited
- Legal minimum and/or industry standard wages are paid
- Working hours are compliant with national laws and do not exceed 48 hours regular + 12 hours overtime
- There is no forced labour and disciplinary measures
- The workplace is safe and healthy
- The environment is respected
- There is a policy for social accountability
- There is an anti-bribery and anti-corruption policy

12.3 SMETA

Sedex is one of the world's leading ethical trade membership organisation, working with businesses to improve working conditions in global supply chains. Their solutions help businesses to map their supply chains, develop supply chain transparency, and manage risks to source more responsibly and improve working conditions in supply chains. Supply chain transparency is when a company knows the full extent of their supply chain, from raw material harvesting and transport of goods to finalised products and services in the forms they are provided to customers. The aim is to be aware of every supplier in the chain and hold key information on them:-

- Where all suppliers through the whole value chain are located – including the suppliers to direct suppliers, and their suppliers, and so on.
- The inherent risks to human and environmental rights associated with the countries, industries, and activities of each supplier. Therefore, a company will also need to know about the people working across their supply chain.