

Policy for responsible business conduct – Wenaas

Introduction

Wenaas strives towards responsible business conduct that respects people, society, and the environment. This policy document, including our Code of Conduct, forms the foundation of our sustainability work.

Wenaas considers responsible business conduct to be a prerequisite for sustainable development, meaning that today's generation receive their needs covered without compromising the ability of future generations to meet their own needs¹. The UN Sustainable Development Goals (SDGs) is the world's joint action plan for sustainable development. **Wenaas** works actively with the Sustainable Development Goals.

Our four core values

Empathic: We show concern for each other and for our customers who do an important job out there every day. **Accurate:** We see the important details of the products, the quality, the production, and the design. **Reliable:** We can be trusted at all stages from development, production, delivery, and customer service. **Responsible:** We take responsibility for ethics, testing and documentation, for customers, the environment and society.

As a member of Ethical Trade Norway **Wenaas** commits to working actively with due diligence for responsible business conduct². Due diligence is a risk-based approach to respect and safeguard people, society, and the environment in our own business and throughout the supply chain. We expect our suppliers and partners to follow the same approach.

Requirements - own business

Wenaas acknowledges that our business conduct can potentially have negative impact on people, society, and the environment. At the same time, we see the potential to contribute to positive development in the supply chain. With this in mind, we have compiled the following principles and criteria guiding our own business:

Due diligence

Wenaas shall conduct due diligence for responsible business conduct. This involves; conducting risk assessments to identify potential negative impact on people, society, and the environment and to stop, prevent and reduce such impact. The measures put in place are monitored and their effect evaluated. The measures are communicated to those affected by our actions. If our activities are found to cause or contribute to negative impact on people, society, or the environment, we will stop the activities and seek to provide remedy. If our supplier is responsible for the negative impact, the supplier is responsible for providing remedy.³

¹ The Brundtland commission, «Our Common Future», 1987

² UN OHCHR, «Guiding Principles on Business and Human Rights (UNGPs)», 2011; OECD, «Due Diligence Guidance for Responsible Business Conduct», 2018.

³ OECD, «Due Diligence Guidance for Responsible Business Conduct», 2018.

Responsible purchasing practices

Wenaas considers responsible purchasing practices to be one of our most important tools for responsible business conduct. **Wenaas** shall adapt our purchasing practices to strengthen, and not undermine, our suppliers' ability to deliver on our requirements related to people, society, and the environment. We strive towards lasting supplier relationships with suppliers who show a particular willingness and ability to create positive developments in the supply chain.

Freedom of association and worker representation

Wenaas supports the right to freedom of association and other forms of democratically elected worker representation. We shall involve worker representatives and other relevant stakeholders in our work with responsible business conduct.

Supplier development and partnership

In dialogue with suppliers we will consider, if needed, to contribute with capacity building or resources that enable our suppliers to comply with **Wenaas's** requirements related to responsible business conduct. This way we lay the foundation for collaboration with suppliers that show the willingness and ability to work on positive development for people, society, and the environment in the supply chain.

Anti-corruption

Wenaas, including all employees, shall never offer or receive illegal or inappropriate monetary gifts or other remuneration to achieve private or business benefits in their own interest or in the interest of customers, agents, or suppliers. Please see Wenaas Workwear Corruption & Anti-Bribery Policy.

Countries affected by trade boycott

Wenaas, including all our suppliers and partners, shall avoid trading with partners that have activities in countries where a trade boycott is imposed by the UN and/or Norwegian Government authorities.

Requirements - conditions in the supply chain

We expect our suppliers and partners to work focused and systematically to comply with our guidelines for suppliers, and our code of conduct, that covers fundamental requirements on human rights, labour rights, anti-corruption, animal welfare and the environment.

Our suppliers shall:

Follow our guidelines and Code of Conduct for suppliers www.wenaas.no and www.wenaas.com

- Conduct due diligence for responsible business conduct. This involves; conducting risk assessments to identify potential negative impact on people, society, and the environment and to stop, prevent and reduce such impact. The measures put in place must be monitored and their effect evaluated. The measures taken must be communicated to those affected by your actions. If the supplier is responsible for the negative impact/damage, they are responsible for providing remedy.⁴
- Show willingness and ability to continuous improvement for people, society, and the environment through collaboration.
- At the request of **Wenaas**, the supplier must be able to document how they, and potential subcontractors, work to comply with the guidelines.

If the supplier, after several requests by **Wenaas**, does not show the willingness or ability to comply with the guidelines for suppliers, the contract may be cancelled.

⁴ OECD, «Due Diligence Guidance for Responsible Business Conduct», 2018.

Principles for responsible business conduct (Code of Conduct)

These principles for responsible business conduct are based on UN and ILO conventions and provide minimum, not maximum standards. The relevant legal framework at the place of production shall be respected. Where national laws and regulations address the same subjects as these guidelines, the most stringent shall apply.

These requirements are applicable to **Wenaas** and all our business partners and suppliers as well as to its own production facilities and their sub suppliers. It is a non-negotiable requirement from our side that all our business partners and suppliers should follow this code, communicate the obligations set out herein and ensure compliance with the code throughout their organizations and supply chain.

1. Forced and compulsory labour (ILO Conventions Nos. 29 and 105)

- 1.1. There shall be no forced, bonded, or involuntary prison labour.
- 1.2. Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.
- 1.3. Working relationships shall be legally binding, and all obligations to employees under labour or social security laws and regulations shall be respected.

2. Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135 and 154)

- 2.1. Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, obstruct, the formation of unions or collective bargaining.
- 2.2 Workers' representatives shall not be discriminated against and shall have access to carry out their representative functions in the workplace.
- 2.3 Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers' representation and negotiations.

3. Child Labour (UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146)

- 3.1. The minimum age for workers shall not be less than 15 and comply with the national minimum age for employment, or the age of completion of compulsory education, whichever of these is higher. If the local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.
- 3.2. There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.
- 3.3. No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety, or morals, including night work.
- 3.4. Policies and procedures for remediation of child labour prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to personnel and other interested parties. Adequate support shall be provided to enable such children to attend and complete compulsory education.

4. Discrimination (ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women)

4.1. There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination, or retirement based on ethnic background, caste, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.2. Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behavior, and from discrimination or termination of employment on unjustifiable grounds, e.g., marriage, pregnancy, parenthood, or HIV status.

5. Harsh or Inhumane Treatment (UN Covenant on Civil and Political Rights, Art. 7)

5.1. Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

6. Health and Safety (ILO Convention No. 155 and ILO Recommendation No. 164)

6.1. The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed. 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 minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

6.2. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.

6.3 Fire safety is an important concern in manufacturing operations. **Wenaas** insists that proper safety conditions be maintained both in the factory workplace as well as all office, living, dining, and recreational facilities.

6.4. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

6.5. Accommodation, where provided, shall be clean, safe, and adequately ventilated, and shall have access to clean toilet facilities and potable water.

7. Wages (ILO Conventions No. 26 and 131)

7.1. Wages and benefits paid for a standard working week shall as a minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income.

7.2. All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.

7.3. 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.

7.4. Employees shall be adequately and clearly informed about the specifications of their wages including wage rates and pay period.

8. Working Hours (ILO Convention No. 1 and 14)

8.1. Working hours shall comply with national laws and benchmark industry standards, and not more than prevailing international standards. Weekly working hours should not on a regular basis be more than 48 hours.

8.2. Workers shall be provided with at least one day off for every 7-day period.

8.3. Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e., that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement.

8.4. Workers shall always receive overtime pay for all hours worked over and above the normal working hours (see 8.1 above), a minimum in accordance with relevant legislation.

9. Regular Employment (ILO Convention No. 95, 158, 175, 177 and 181)

9.1. Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided using short-term contracting (such as contract labour, casual labour, or day labour), sub-contractors or other labour relationships.

9.2. All workers are entitled to a contract of employment in a language they understand.

9.3. The duration and content of apprenticeship programs shall be clearly defined.

10. Marginalized Populations (UN Covenant on Civil and Political Rights, art. 1 and 2)

10.1. Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.

11. Corruption

11.1. Corruption in any form is not accepted, including bribery, extortion, embezzlement, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers, or employees of any such party or government officials.

11.2. We will not accept any kind of corruption related to our business and expect all our partners in our supply chain to embrace this position.

12. Animal welfare

12.1. Animal welfare shall be respected. Measures should be taken to minimize any negative impact on the welfare of livestock and working animals.

12.2. National and international animal welfare legislation and regulations shall be respected.

12.3. We do not tolerate unethical and inhumane treatment of animals. For wool we ban mulesed wool and only buy certified mulesing-free merino wool. Mulesing is a method farmers use in Australia, and a painful procedure to prevent fly larvae settling in the skin of the merino sheep.

12.4. Adverse impacts on animal welfare issues listed below should as a minimum be managed:

- In business where animals are used in the production (fur, wool, leather, silk etc) such animals must be fed and treated with dignity and respect and no animal must deliberately be harmed nor exposed to pain in their lifespan.
- Taking the lives of animals must, always, be conducted using the quickest and the least painful and non-traumatic method available and approved by national and acknowledged veterinarians and only conducted by trained personnel.

13. Environment

13.1. Negative impact on the environment shall be reduced throughout the value chain. In line with the precautionary principle, measures shall be taken to continuously minimize greenhouse gas emissions and local pollution, the use of harmful chemicals, pesticides, and to ensure sustainable resource extraction and management of water, oceans, forest and land, and the conservation of biodiversity.

13.2. National and international environmental legislation and regulations shall be respected, and relevant discharge permits obtained.

13.3. In addition to the requirements listed below, our business partners and suppliers are encouraged to develop a formal Environmental Management System and monitor their environmental performance so that they can maintain a process of continuous improvement.

14. Emission to air, water, and ground

14.1. Our business partners and suppliers shall ensure compliance with all applicable laws and regulations pertaining to air, water, noise pollution and ground contamination and if required obtain the necessary permits and be able to demonstrate compliance with those permits.

14.2. Our business partners and suppliers shall ensure compliance with all applicable laws and regulations pertaining to ground contamination.

15. Waste management

15.1. Waste must be stored and disposed properly as per legal regulations without any harm to employees and the environment.

16. Chemicals management in the factory

(Below, the word chemicals refer to both substances and products, such as lubricant oil, glue, solvents, and dyes.)

16.1. Our business partners and suppliers shall ensure compliance with applicable laws and regulations pertaining to procurement, storage handling and use of chemicals.

16.2. At **Wenaas**, we have a valid permit for chemicals that are legally restricted. Our business partners shall demonstrate compliance with those permits. Specific requirements regarding chemicals in products related to information provision, limit values for chemical residues in products, banned chemicals and testing requirements are specified in **Wenaas** Restricted Substances List (RSL).

17. Records and provision of information

17.1. Our suppliers and business partners throughout their supply chain shall establish and maintain a list of all chemicals used in production and maintenance, including the name of the chemical product, the purpose or area of use and a reference to a Material Safety Data Sheet.

17.2. Our suppliers and business partners shall have valid Material Safety Data Sheets (MSDS) for all chemicals used in production and maintenance.

18. Procedure for chemical management

18.1. Our suppliers and business partners and business partners throughout their supply chain shall have a written procedure for the storage, handling, and use of chemicals.

18.2. The procedure shall specify who is responsible to ensure that proper procedure for handling chemicals is followed at the suppliers/business partners and within its supply chain.

19. Employee information and training

19.1. Our suppliers and business partners and their business partners/sub suppliers throughout their supply chain shall ensure that employees that procure, store, handle and use chemicals have the right competence and are adequately trained. Records from training shall be kept by the suppliers and business partners.

19.2. Information regarding the risks and safe handling of chemical compounds and substances shall be displayed at storage areas and in production areas where the chemical is used. The information can be either the Material Safety Data Sheet, or specific instructions for safe handling and use (following the MSDS). Information must be in a language understood by the workers.

20. Labelling of chemicals

20.1. Our suppliers and business partners throughout their supply chain shall ensure all containers of chemicals – including temporary containers - are properly labelled with appropriate danger symbols and chemical names to ensure the contents are known and the potential risk minimized.

21. Storage and handling of chemicals

21.1. Our supplier and business partners throughout their supply chain shall undertake all necessary precautions to prevent chemicals from leaking to air, ground, and water.

22. Disposal of chemicals

22.1. Our suppliers and business partners throughout their supply chain shall dispose chemicals in compliance with legal regulations referring to their classification.

22.2. Our suppliers and business partners shall undertake all necessary precautions to prevent chemicals from leaking to air, to ground and to water.