



### Introduction

Sambro International Ltd. is committed to legal compliance and ethical business practices in all operations and will only do business with suppliers who obey the laws of the country in which they operate and the principles expressed in this Code of Practice.

Sambro product can only be placed in factories that have a 3rd party ethical audit. Acceptable audit types are BSCI, SMETA, ICTI, Disney ILS and Better Works. Audits are renewed at least every 12 months and Sambro will withdraw product from any site found not to have a valid ethical audit.

Sambro does not accept Fully Announced audits, all audits must be booked on a Semi-announced or Unannounced basis.

Factories that work with Sambro must understand that the ethical audit process is an ongoing procedure, and show continual commitment to improve. All factories are expected to work towards remediation of any non-compliances that are found on an audit. Factories should be aware that ethical audits may be graded differently by different customers and licensors, and should be willing to undergo any corrective actions that may be issued. Sambro will work together with all factories on remediation of any none compliances and expects full cooperation in this matter.

Suppliers may not place Sambro product in a factory that has not been previously declared to Sambro, and suppliers are expected to do their own due diligence to ensure that any factories proposed are suitable for Sambro goods, meet the ethical audit requirements and adhere to the below code of practise.

New factories proposed for Sambro product will undergo assessment by the Sambro team before any orders are placed – Sambro will not retrospectively approve factories.

Certain Licensors and customers reserve the right to audit any factories that have been declared to them, and we expect full cooperation from our suppliers in this matter. All factories must be willing to allow reasonable access to our customers or their representatives.

Sambro reserves the right to withdraw production from a factory at any time if it does not meet our, or our licensors, ethical requirements, or is not showing commitment to improve on reoccurring issues.

### Code of Practise

#### 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.

#### 2. Freedom of Association and the Right to Collective Bargaining are Respected

2.1 Where such organizations are legal in their own country workers 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.

#### 3. Working Conditions are Safe and Hygienic

3.1 A safe and hygienic working environment shall be provided, meeting local legal requirements and bearing in mind the prevailing knowledge of the industry and 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, as so far is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Unrestricted access to clean toilet facilities and potable water, and if appropriate sanitary facilities for food storage, shall be provided.

3.3 Accommodation, where provided shall be clean, safe, and meet basic needs.

3.4 The company shall assign responsibility for health and safety to a senior management representative.

3.5 All workers to receive regular and recorded health and safety, and fire safety training, and such training shall be repeated for new or re-assigned workers.

#### 4. Child Labour Shall not be Used

4.1 The use of child labour is not acceptable. Employees in all manufacturing units, including sub-contractors, must meet the minimum legal working age in the country where they are working.



## **5. Wages and Benefits**

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal requirement, or local industry 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 are provided with written and understandable information about their employment conditions and wages before they enter employment and each time the wage is paid.

5.3 Deductions from wages as a disciplinary measure are not permitted. There shall be no deductions not required by national law without the written permission of the worker.

## **6. Working Hours are not Excessive**

6.1 Working hours must comply with national laws and benchmark industry standards, whichever affords greater protection.

6.2 Workers should not be required, on a regular basis, to work more than 48 hours per week. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded regularly, and must be compensated at a premium rate.

6.3 Workers must be provided with at least one day off for every seven. Holidays and sick leave must comply with national law.

## **7. No Discrimination is practiced.**

7.1 There must be 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 As far as possible, work performed must be on the basis of a recognized employment relationship, established through national law and practice

8.2 Obligations to employees under labour law must not be avoided through the use of fixed term contracts, labour only, or sub-contracting, home working or through apprenticeship schemes where there is no real attempt to impart skills or provide regular employment.

8.3 Employers are encouraged to promote training and education for their employees.

## **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 not be permitted.

9.2 Any disciplinary procedures taken by the employer must be fair and documented.

## **10. Environment**

10.1 Suppliers will ensure their activities, and those of their suppliers are conducted with due regard for the environment and comply with applicable environmental, safety and health regulations.