



# **CODE OF CONDUCT**

## BRANDS OF SCANDINAVIA

REVISED 13.08.2024



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## 1. GENERAL PRINCIPLES

This Code of Conduct reflects the values of Brands of Scandinavia A/S and is based on the Universal Declaration of Human Rights and key UN and ILO conventions.

When signing this Code of Conduct we wish for our suppliers to commit to the same principles.

Implementing these principles is a long and challenging journey. However, we are committed to forming business partnerships with suppliers who consistently strive to integrate these principles into their operations.

### 1.1 Scope

The requirements of this Code extend to all factories used by Brands of Scandinavia A/S and all their workers working within those factories, regardless of their status or relationship with suppliers. This Code therefore also applies to workers who are engaged informally, on short-term contracts or on a part-time basis.

Where there are differences between the terms of this Code of Conduct and national laws or other applicable standards, suppliers shall adhere to the higher requirements. If conflicts between national law and this Code of Conduct are detected, suppliers must inform Brands of Scandinavia A/S immediately.

### 1.2 Transparency

It is essential for Brands of Scandinavia A/S that suppliers show transparency and declare all production units to Brands of Scandinavia A/S upon request. In addition, this information should be updated regularly. Transparency is essential for Brands of Scandinavia A/S to work towards a more sustainable supply chain.

See Appendix A for the information sheet to be filled in.

### 1.3 Managing your Supply Chain

Suppliers should have a proper management system to ensure that the principles of this Code of Conduct are not violated and that continuous improvements are implemented.

This includes performing your own risk assessments and self-assessments of all production units.

Here, Brands of Scandinavia A/S will prepare self-assessment questionnaires (SAQ) in connection with on-site supplier visits. The SAQ process involves dialogue with the supplier and follows the assessment checklist structure provided by Brands of Scandinavia A/S. This includes topics such as work environment and safety. To supplement the dialogue, Brands of Scandinavia A/S may request additional documentation if deemed necessary.

### 1.4 Monitoring and Evaluation

Suppliers must assign responsibility to one or more management representatives with the responsibility and authority to ensure compliance with this Code of Conduct.

All production units shall be open to audits at any time if requested by Brands of Scandinavia A/S. In the case where we require an audit of the facility, we may be represented by an independent third-party auditing company of our choice.

Suppliers shall maintain appropriate records to show compliance with this Code of Conduct requirements. Records shall be available to Brands of Scandinavia A/S upon request.

Where instances of non-compliance are detected during supplier visits, suppliers will be given a fixed period to remediate the findings. In the event of failure to remediate, Brands of Scandinavia A/S is willing to engage in a constructive dialogue with suppliers to develop and implement action plans with appropriate time scales for implementation and improvements to be achieved.

Brands of Scandinavia A/S does not operate with a passed/failed policy and terminating a business relationship will only be the last instance. However, Brands of Scandinavia A/S will not conduct business with a supplier if compliance with the terms of this Code of Conduct is deemed impossible and the supplier shows no willingness or ability to improve. If the supplier is willing to work with us on continuous improvements, Brands of Scandinavia A/S is also willing to work with the supplier.

## 2. THE BRANDS OF SCANDINAVIA A/S REQUIREMENTS

The following paragraphs reflect the values as well as legal requirements of Brands of Scandinavia A/S and constitute the minimum requirements for our suppliers within each area.

### 2.1 Human Rights and Labor Rights

#### 2.1.1 Forced labor

- Suppliers must not use forced, prisoned or illegal labor in any of our supplier's production units.
- Workers shall not have to leave any sort of deposit and/or ID/passport when hired by the factory.
- The worker shall always sign a contract upon beginning work at the factory. The contract shall be written in a language that the worker understands.
- The worker has the right to terminate the employment according to national law.
- Overtime should be voluntary at all times.
- Workers should have free access to toilets, water, and praying rooms at all times if/when necessary.
- Suppliers must ensure that all feasible measures are taken to prevent workers from falling into debt bondage through company loans.

### 2.1.2 Freedom of Association

- Suppliers should recognize the right of workers to join, form or not to join trade unions of their choice without fear of intimidation, reprisal or harassment;
- The supplier should engage in collective bargaining with legally recognized employee representative
- When law restricts unions, the supplier should encourage and not prevent the formation of worker committees, from which workers have the opportunity to, collectively express their grievances directly to the management.

### 2.1.3 Working hours and Compensation:

- Working hours should always be kept within the limits of national law, but no higher than 60 hours per week, including overtime hours.
- Workers should receive at least one rest day in a 7-days period.
- Workers should be free to refuse overtime without fearing contract termination or punishments.
- All national laws regarding compensation to workers should be kept.
- Withholding of wages for any reason is not allowed.
- Workers should be given at least the national minimum wage, and this should be enough to meet the basic needs of the workers.
- Pay slips must always be signed and handed over to the respective worker.
- National law on social insurances must be kept at all times.

### 2.1.4 Discrimination and harassment:

- Workers shall never be discriminated against in relation to race, color, caste, nationality, religion, gender, age, sexual orientation or marital status.
- The supplier must ensure that policies are in place to prevent any form of harassment and discrimination in the factory.

### 2.1.5 Child labor and young workers

- Brands of Scandinavia A/S Child Labor Policy should be followed upon beginning of cooperation and applied in cases where child labor is found in the supply chain.
- The supplier should have sufficient management systems in place to ensure that no children under 15 years of age are working in production units producing for Brands of Scandinavia A/S. If the law states a higher age, then this must be followed.
- Young workers under the age of 18 may only perform light work and only within normal working hours. Suppliers must comply with all local laws concerning young workers.
- Young workers must not be exposed to work that is harmful to their morals or health, dangerous to life, or likely to hamper their normal development.
- For more detailed requirements, please see our Child Labor Policy, Appendix B.

## 2.2 Health and safety

### 2.2.1 Management system

- The supplier should have sufficient management systems in place to ensure that health and safety of the workers are never compromised in any decisions taken.
- The supplier should conduct periodic risk assessments to ensure that all risks are managed and that there is no risk to human life or risks that can cause serious accidents.

### 2.2.2 Safety

- The working environment should be safe, healthy and clean at all times and all working stations shall be provided with sufficient lighting.
- Relevant first aid equipment must be available and where legally required a doctor, or nurse should be available during working hours

### 2.2.3 Fire safety

- All local laws regarding fire safety must be kept, and all facilities producing for Brands of Scandinavia A/S must as a minimum install adequate warning systems, fire safety equipment and well-marked exits and escape routes.
- Fire escapes should be clear for passage and must not be locked or blocked at any time
- Fire drills must be conducted on an annual basis.
- Suppliers shall ensure that safety precautions in regard to the use, storage and handling of chemicals are taken.
- Suppliers shall ensure that electrical installations are according to law and do not pose a risk to fire safety in the production facility.

### 2.2.4 Chemical handling

- All chemicals and hazardous materials must be safely handled, transported, and disposed of according to law.
- Workers should be trained in handling chemicals and should always be provided with sufficient protective equipment when handling these.
- MSDS (Material Safety Data Sheet) should be provided for all chemicals on site

### 2.2.5 Dormitories, kitchens and dining rooms

- Dormitories must be placed in buildings separate to the production building
- Dormitories must have sufficient living and storage space for workers
- Workers must have easy access to food or sanitary food storage, clean water and toilet/bathing facilities
- Dormitories, Kitchens and Dining areas must take all required health and safety as well as fire safety precautions.

## 2.3 Environmental protection

- National environmental laws and regulations must be complied with at all times
- Water should be used responsibly, and disposal of wastewater should be according to the law.
- Suppliers should monitor all emissions that are produced during production and treated according to law.
- Solid waste should always be handled and disposed of in accordance with local law.

*For more detailed requirements, please see our Environmental Policy, Appendix C.*

## 2.4 Chemicals

- It is the suppliers' responsibility that any product supplied to Brands of Scandinavia A/S is free of prohibited substances and chemicals beyond the legal limits of the REACH regulation and the AFIRM RSL (see Appendix F).
- Suppliers must comply with the latest version of the AFIRM RSL, see Appendix F.
- Suppliers must follow the requirements on documentation concerning Substances of Very High Concern (SVHC-list) in articles imported to the EU.

## 2.5 Anti-corruption

- Suppliers shall work against corruption in all forms.
- Suppliers should establish adequate processes to avoid corrupt practices. Such processes should support and be in line with the United Nations Convention against Corruption.

*For more detailed requirements, please see our Anti-Corruption Policy, Appendix D.*

## 2.6 Animal Welfare

- Brands of Scandinavia A/S products derived from animals, should be produced with the highest regard to the welfare of the animals. Supplier should ensure that animals are treated according to animal welfare laws and international recommendations.
- Brands of Scandinavia A/S request all suppliers to follow our Animal welfare policy. Hereby stating that the supplier respects animal welfare and that they have the right policies in place to ensure animal welfare in the supply chain.

*For more detailed requirements, please see our Animal Welfare Policy, Appendix E.*

## 3. GRIEVANCE SUPPLIERS & PARTNERS

Brands of Scandinavia A/S has developed a grievance mechanism for our suppliers and partners, to ensure a fair and professional handling of any grievances related to our partnerships, services, or products. This includes unfair or unprofessional treatment, dissatisfaction, and partners' rights.

Brands of Scandinavia A/S asks you to make use of the following mail: [grievance@brandsofscandinavia.com](mailto:grievance@brandsofscandinavia.com)

The mail will then be sent to a third party outside the production team. They will contact the relevant person within Brands of Scandinavia A/S, enabling the correct handling of any complaint.

### A grievance can be filed when, but is not limited to:

- Cases of workplace harassment, bullying, or discrimination
- Cases where health and safety have been compromised
- Witnessing poor supervisor and/or management behaviour
- Cases of unjust changes made to agreements
- Policy guidelines are violated

Brands of Scandinavia A/S wishes to differentiate between levels of complaints. Hence, the below options are described. However, all suppliers and partners should use the option they find the most comfortable in any given case.

### A grievance can be filed using the following options:

1. Contact your primary contact person from Brands of Scandinavia A/S
2. Anonymously filing through the Brands of Scandinavia A/S grievance mail ([grievance@brandsofscandinavia.com](mailto:grievance@brandsofscandinavia.com))

## 4. CLOSURE AND COMMITMENT

As our supplier you are committed to keeping yourself updated about changes and corrections in the regulations of the EU, to ensure compliance in your production.

Brands of Scandinavia A/S will arrange for random controls of our orders/styles made by SGS to see if regulations for REACH (EU1907/2006) and the AFIRM RSL (see Appendix F) are followed. Supplier will be informed if an order needs to be further controlled before delivery.

Any production which does not meet our standard according to this manual, should be rejected by suppliers' own QC otherwise it will be rejected in Denmark QC of Brands of Scandinavia A/S.

Quality is the backbone and first priority of our business. We cannot destroy our reputation in the market by delivering garments of low quality or with bad construction.

## 5. SIGNATURE

When signing this page, you agree to adhere to the Brands of Scandinavia A/S Code of Conduct, including all Appendices and the Supplier Manual:

- **Appendix A: Production Unit Mapping**
- **Appendix B: Brands of Scandinavia A/S Child Labor Policy**
- **Appendix C: Brands of Scandinavia A/S Environmental Policy**
- **Appendix D: Brands of Scandinavia A/S Anti-corruption Policy**
- **Appendix E: Brands of Scandinavia A/S Animal Welfare Policy**
- **Appendix F: Brands of Scandinavia A/S Chemical Policy**
- **EU Regulation REACH**

*Name of supplier: [Factory Site]*

*Name: [Signatory]*

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Date

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Signature

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Stamp

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