

Appendix 2

GANT Code of Conduct for suppliers

At GANT we always stay true to ourselves as individuals, to our GANT values and beliefs. We are genuine and respectful towards each other, our consumers and the environment. We are accountable and take personal responsibility. We recognize that we play a role in the development of a sustainable society.

In accordance with the ILO Conventions, the United Nations' Universal Declaration of Human Rights, the UN's Conventions on children's rights and the elimination of all forms of discrimination against women, the UN Global Compact and the OECD Guidelines for Multinational Enterprises, U.K. Modern Slavery Act and other relevant internationally recognised agreements, the GANT Code of Conduct aims to attain compliance with certain social and environmental standards. By signing the GANT Code of Conduct companies /suppliers are, within their scope of influence, committed to acknowledge the social and environmental standards laid down in this Code and to take appropriate measures within their company policy for their implementation and compliance. Supplier companies, in addition, must ensure that the Code of Conduct is also observed by subcontractors involved in production processes of final manufacturing stages carried out on behalf of GANT members.

Within the scope of options for action and appropriate measures, these supplier companies have to aim at the implementation of the following criteria in a development approach:

1. Legal Compliance

Compliance with all applicable laws and regulations, industry minimum standards, ILO and UN Conventions, and any other relevant statutory requirements whichever requirements are more stringent. Where there are differences between the provisions of this code and national laws or other applicable standards, suppliers shall adhere to the higher or more stringent requirements. Our requirements may however not be limited to legal requirements.

2. Freedom of Association and the Right to Collective Bargaining

All personnel must have the right to exercise their legal right to form or join a trade union and participate in collective bargaining without threat of reprisal, intimidation or harassment (ILO conventions 87, 98 and 135)

When operation in countries where trade union activity is unlawful or where free and democratic trade union activity is not allowed, suppliers shall respect this principle by allowing workers to freely elect their own representatives with whom the company management and personnel can enter into dialogue about workplace issues.

3. No Discrimination

No discrimination shall be tolerated in hiring, remuneration, access to training, promotion, termination or retirement based on gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in workers' organizations including unions, political affiliation or opinions, sexual orientation, family responsibilities, marital status, or any other condition that could give rise to discrimination. (ILO Conventions 100, 111).

4. Humane Treatment/Anti-Harassment and Abuse

Suppliers should treat all personnel with respect and dignity and commit to a workplace free of harassment and abuse. Physical punishment or the threat thereof, sexual or racial harassment, verbal abuse or power abuse of any form of harassment or intimidation is unacceptable under any circumstances.

5. Prevention of Involuntary Labour and Human Trafficking

Suppliers shall ensure that all work is voluntary. Suppliers shall not traffic persons or use any form of slave, forced, bonded, indentured or prison labour. Involuntary labour includes the transportation, harbouring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Supplier shall ensure that the third-party recruitment agencies it uses are compliant with the provisions of this Code and the law.

6. No Child Labour

GANT does not accept child labour.

A child is defined as a person younger than 15 years of age, or as an exception, 14 years of age in countries referred to in article 2.4 of the ILO convention 138. If the national legal age for working is higher than 15 years of age, the supplier must adhere to the higher requirement.

The supplier shall establish and implement a child labour policy ensuring that no child is employed.

If child labour is detected in the production of goods for GANT the supplier is obliged to offer a sustainable solution in the best interest of the child.

Special protection for Young workers/ Juvenile Worker Protections

Young employees (below the age of 18 years) may only be employed in non-hazardous work and not work at night, if they are above the country's legal age for working. Suppliers shall not require juvenile workers to work overtime.

7. Fair Remuneration/Wages and Benefits

Suppliers shall respect the right of the employees/workers to receive fair remuneration that is sufficient to provide them with a decent living for themselves and their family, as well as the social benefits legally granted, without prejudice to the specific expectations set out hereunder.

Suppliers shall comply, as a minimum, with wages mandated by government's minimum wage legislation, or industry standards approved on the basis of collective bargaining, whichever is highest.

Wages, overtime and benefits are to be paid in a timely manner, regularly, and fully in legal tender.

Deductions will be permitted only under the conditions and to the extent prescribed by law or fixed by collective agreement.

8. Working Hours

Suppliers shall set working hours in compliance with applicable laws, and regular working.

A workweek shall be restricted to 60 hour, including overtime. Workers shall take at least one day off every seven days except in emergencies or unusual situations defined by the ILO. Regular work week shall not exceed 48 hours, all overtime must be voluntary.

9. Labour Contract

All employees should be entitled to a written labour contract in accordance with the law.

10. Working Conditions/ Health and Safety

Suppliers should comply with applicable laws and regulations for occupational health and safety and provide the employees with a safe and healthy work place.

Employees should be provided with sufficient personal protection equipment for the work performed.

The supplier shall take efficient steps to prevent potential accidents and injuries to workers and have a clear set of regulations and procedures to be followed. All personnel shall have the right to remove themselves from imminent serious danger without seeking permission from the company.

Working and Living Conditions

Suppliers shall provide access to portable water and clean toilette facilities, safe and clean eating and resting areas and if appropriate, sanitary facilities for food storage shall be provided.

When dormitory facilities are provided, these should meet all applicable laws and regulations related to health and safety, including fire safety and electrical and structural safety.

Health and Safety Communication

GANT

Suppliers shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the factory.

11. Environment and Safety Issues

Suppliers should comply with existing environmental legislations and obtain all legally required permits, licenses and registrations applicable for their business.

GANT's Environmental Policy states that all employees, partners and suppliers show respect for the environment in their decisions and strive to minimize any negative impact on the environment.

The supplier shall introduce and maintain a suitable environmental management system or equivalent to minimize environmental risks, and continuously improve the company's environmental performance.

Procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, waste water, emissions and effluent treatment must meet or exceed minimum legal requirements.

12. Ethical Business Behaviour

GANT expects the highest standards of ethical conduct in all of our businesses. Suppliers shall always be ethical in every aspect of its business, including relationships, practices, sourcing and operations.

13. Management Systems

The supplier company shall define and implement a policy for social accountability, a management system to ensure that the requirements of the GANT Code of Conduct can be met as well as establish and follow an anti-bribery / anti-corruption policy in all of their business activities. Management is responsible for the correct implementation and continuous improvement by taking corrective measures and periodical review of the Code of Conduct, as well as the communication of the requirements of the Code of Conduct to all employees. It shall also address employees' concerns of non compliance with this Code of Conduct.

Monitoring, Corrective Action and Non-Compliance

GANT expects its suppliers to respect the Code of Conduct and to actively do the utmost to fulfil GANT's requirements in their own organisation and throughout their supply chain. This should be done by cooperating in a transparent manner, by for example granting GANT access to relevant documentation and premises.

GANT reserves the right to carry out announced and unannounced audits of all premises producing our goods at any time, either by GANT or by an independent third party of our choice.

If GANT determines that a production unit is violating this Code, we expect the supplier to take responsibility for the implementation of corrective actions. If corrective action is advised but not taken, GANT may suspend the placement of future orders or terminate the business relation at its own discretion.

Consequences of Non-Compliance

If a supplier fails to meet the requirements of the GANT Code of Conduct, and if no solutions can be agreed upon and implemented within a reasonable amount of time, a GANT member may choose to halt current production, cancel corresponding contracts, suspend future contracts and/or terminate the business relationship with the non-conforming supplier. If an audit reveals less than full compliance with the GANT Code of Conduct, the supplier must take the prescribed corrective actions without delay.

Name of the company: _____

Authorized signatory: _____
(name)

(title)

GANT

Signature:

Date:

GANT