



## CHARLES KIRK

### Code of Conduct for the Responsible Manufacture and Sourcing of Merchandise

Charles Kirk's Code of Practice for the Responsible Manufacture and Sourcing of Merchandise sets out this companies expectations for ourselves and our suppliers on issues such as pay, working hours, child labour, worker rights and discrimination. In sourcing products from overseas, Charles Kirk aims to uphold internationally agreed standards of labour, and expects suppliers to treat employees fairly, honestly and with respect for their basic human rights.

Charles Kirk and all suppliers of products to Charles Kirk will do so in accordance with this Code of Conduct. For these purposes "Suppliers" include ourselves, our contractors and suppliers of goods and services.

- Suppliers are expected to deliver compliance to this Code by creating successful management systems, and maintaining records to demonstrate their compliance.
- Suppliers are obligated to communicate the requirements of this Code to all employees, suppliers and any out-workers or subcontractors engaged in their supply chain.
- Suppliers are required to comply with all applicable national laws in the countries in which they operate and all International Labour Organisation conventions. Where these standards differ, the standard that provides workers with greater protection will prevail.

<b>EMPLOYMENT IS FREELY CHOSEN</b>	There is no forced, bonded or involuntary labour of any description.
	Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.
	Employees are allowed the right to leave after giving reasonable notice
	The supplier will not knowingly purchase any merchandise produced through forced, bonded or involuntary labour or by people working illegally

<b>FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED</b>	Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
	The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
	Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace
	Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.



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<b>WORKING CONDITIONS ARE SAFE AND HYGIENIC</b>	A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of 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 minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
	Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
	Access to clean toilet facilities and to potable water, and, if WORKING appropriate, sanitary facilities for food storage shall be provided.
	Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
	The supplier observing the code shall assign responsibility for health and safety to a senior management representative.
	They must minimise the risks of fire, accident and injury.
	Suppliers must complete fully documented risk assessments of their sites and accommodation provided, and regularly monitor risks posed to workers' health and safety.
	Records of safety training must be available for inspection. Individual workers must be able to demonstrate their understanding of the job and the ability to perform it to at least the minimum standard required by their employer.

<b>CHILD LABOUR SHALL NOT BE USED</b>	There shall be no employment or recruitment of child labour.
	If children or young people are found working for any supplier in contravention of this Code of Practice, the supplier involved will be expected to cease the practice and provide remediation for the children or young people concerned, where appropriate. Management shall document their agreement to the principles of remediation even if there are no known children employed.
	Suppliers shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
	Children and young persons under 18 shall not be employed at night or in hazardous conditions.
	These policies and procedures shall conform to the provisions of the relevant ILO standards.
	The supplier shall pay particular attention to the health and safety and educational needs of young employees.



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<b>WORKING HOURS ARE NOT EXCESSIVE</b>	Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
	Must not be excessive, with proper provision for sleep and resting time if necessary.
	In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 days period on average.
	Breaks, holiday allowance and rest periods shall be in full accordance with national law. Individual workers shall have on average at least one full day's rest per week or the equivalent if shift work is involved.
	Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and should always be compensated at a premium rate.
<b>LIVING WAGES ARE PAID</b>	Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
	Wages and benefits must be at least fully comparable with local norms. Where possible they should be better than the national legal minimum or industry benchmarked norms or what is required to achieve a locally acceptable standard of living. Wages should be paid in full and on time, at agreed intervals.
	All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
	Before entering into employment, workers should be informed as to the payment process. Wages shall be paid directly to the workers in the form of cash or cheques or into the workers' nominated bank account, at the agreed intervals and in full. Information relating to wages shall be available to workers in an understandable form.
	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 without the express permission of the worker concerned. All disciplinary measures should be recorded.



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<b>REGULAR EMPLOYMENT IS PROVIDED</b>	To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
	Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.
	Providing they show sufficient ability and capability, employees should have equal access to jobs.
<b>NO HARSH OR INHUMANE TREATMENT IS ALLOWED</b>	Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
	Disciplinary and grievance procedures shall be clearly documented and communicated to all employees. All disciplinary measures of a serious nature shall be recorded.
<b>NO DISCRIMINATION IS PRACTISED</b>	There is 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.
	Workers must not be expected to perform duties incompatible with their physical or mental abilities.
<b>LEGAL REQUIREMENTS</b>	Charles Kirk is committed to full compliance with the laws and regulations in each procurement location where Charles Kirk conducts business, and will not knowingly operate in violation of any such law or regulation.
	Charles Kirk will not knowingly use suppliers who violate applicable laws and regulations.



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## Definitions

<b>Child</b>	Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply.
<b>Young Person</b>	Any worker over the age of a child as defined above and under the age of 18.
<b>Child Labour</b>	Any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.