



**RODD & GUNN®**  
NEW ZEALAND

## SUPPLIER POLICIES

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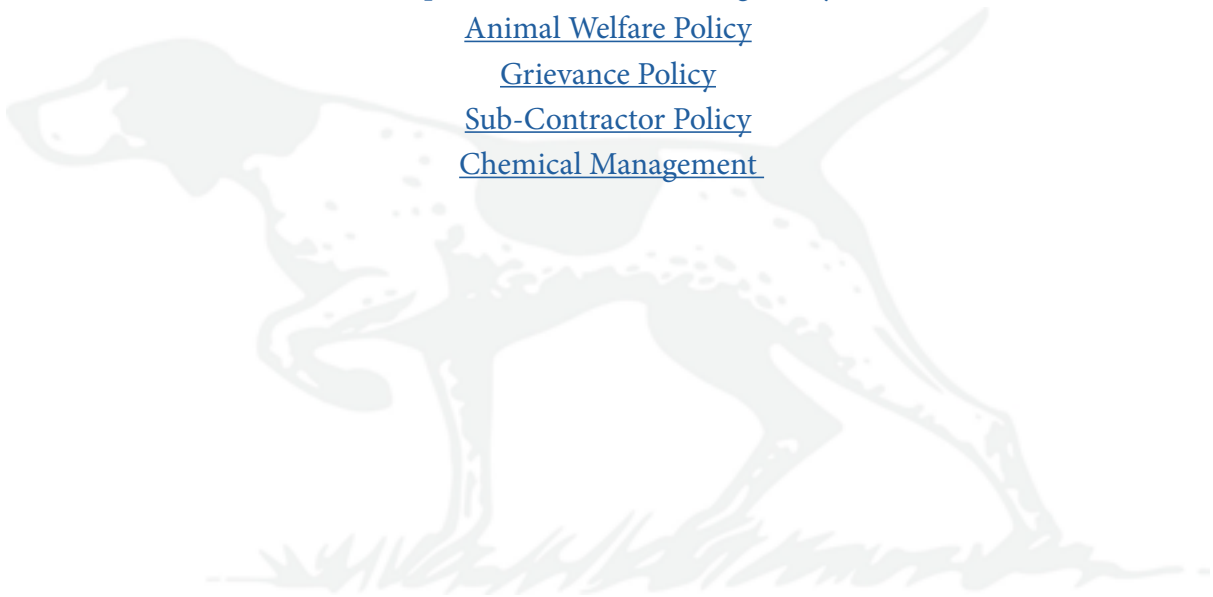
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# **RODD & GUNN®**

## **NEW ZEALAND**

### **GENDER EQUALITY POLICY**

This policy aims to provide gender specific requirements and strategies to prevent discrimination & inequality faced by women in the apparel industry.

All suppliers of Rodd & Gunn products, and their sub-facilities involved in the production (including textile production and raw material farms/facilities), are expected to adhere to the standards as defined in section 1.9 of the Supplier Code of Conduct (“Code”), in conjunction with the additional policy clauses below.

## **1. Policy Requirements**

### **1.2 Discrimination**

- Women and men workers shall be protected against discrimination on the basis of marital status.
- Pregnancy tests or the use of contraception shall not be used as a condition of hiring or continue employment.
- Equal opportunities for women and men shall be provided in all aspects of training and personal and professional development.

### **1.3 Wages & Benefits**

- Fair and comparable wages, hours, and benefits are guaranteed to all workers for comparable work.
- Women employees are entitled to maternity protection (leave and benefits as well as protection against discrimination) in accordance with the requirement of national laws and regulations or ILO Conventions nos. 183, 103, and 3, whichever is higher.
- Childcare benefits and special leave or working time arrangements for workers with family responsibilities shall apply to both men and women.

### **1.4 Health & Safety**

- Men and women engaged in working with hazardous materials will be informed of the potential risks to their reproductive health. To prevent unsafe exposure to hazardous chemicals and hazardous substances, appropriated accommodations shall be made for pregnant women.
- Flexible working arrangements on-site facilities shall be offered to women who are pregnant or nursing.

## **2. Strategies**

- 2.1 Rodd & Gunn commit to raising awareness in production facilities and where possible seek collaboration with specialised industry organisations, trained to deliver programs that empower female workers in the apparel industry.
- 2.2 Rodd & Gunn encourage suppliers to promote female representation in leader positions & worker representation groups.
- 2.3 Regular on-site audits in production facilities will provide close monitoring on gender discrimination & female worker empowerment.

## **3. Implementation**

- 3.1 Rodd & Gunn expect suppliers to communicate this policy within their own facilities and with the extended supply chain.
- 3.2 In adopting the Code & Policy standards, suppliers and their sub-facilities agree to engage fully with Rodd & Gunn in building awareness for female workers through skill-building and internal policy development.
- 3.3 Effective from Aug 2018, the Rodd & Gunn auditing checklist consists of tailored questions to assess a factory’s position and strength on gender equality, further enhancing our ability to address specific risks and needs in the future. Regular periodic reviews of our auditing protocol ensure that the information we capture through gender specific data is aligned with our Code & Policy values.



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### **NO CHILD & FORCED LABOUR POLICY**

#### **1. Purpose**

This policy is based on the Company's commitment to find practical, meaningful and culturally appropriate responses to support the prohibition and elimination of the worst forms of child labour and forced labour. This policy has been formulated in consideration of the ILO Conventions No. 029, 105, 138 and 182. It therefore endorses the need for appropriate initiatives to progressively eliminate these abuses.

#### **2. Scope**

All suppliers of Rodd & Gunn products, and their sub-facilities involved in the production (including textile production and raw material farms/facilities), are expected to adhere to our Supplier Code of Conduct and additional policy requirements listed herein.

#### **3. Objectives**

Rodd & Gunn have a zero-tolerance approach to Child & Forced Labour in any part of its supply chain. It is essential that Children are not put at risk or deprived of an education or childhood in any way mentally, physically, socially or morally harmed, through working in supply chains. All workers shall have the right to choose their employment freely without any coercion, threat or penalty. Every effort should be made to ensure that child / forced labour does not feature in any supply chain.

#### **4. Strategies**

- 4.1 This policy is publicly available throughout the Company and clearly communicated to all employees in a manner in which it can be understood through induction programs and policy manuals.
- 4.2 The implementation of the policy is the responsibility of the facilities human resources department and the security staff, who do not permit minors to enter the factory as workers.
- 4.3 There is a zero-tolerance policy towards its breach.
- 4.4 Employment contracts and other records, documenting all relevant details of the employees, including age, are maintained at all facilities and are open to verification by any authorised personnel or relevant statutory body.
- 4.5 The facility provides an annual report to the functional head on any incidents of child and/ or forced labour.

#### **5. Actions**

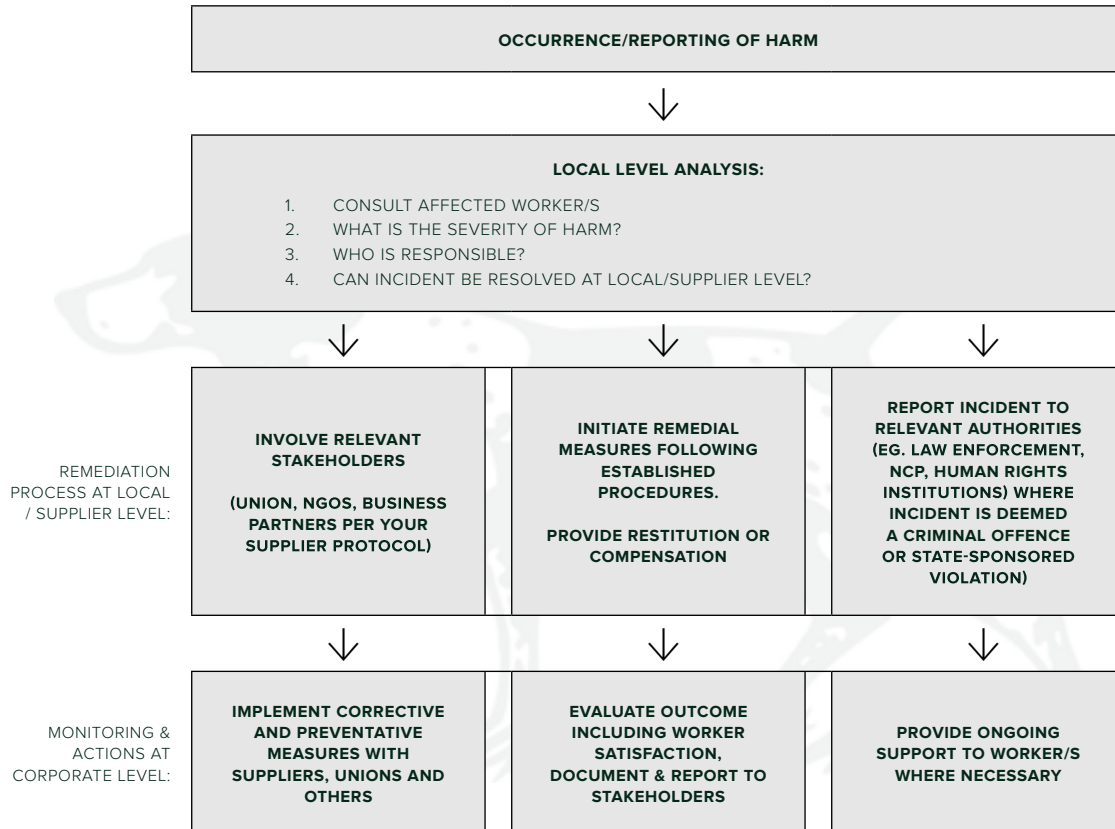
- 5.1 Periodic assessment is conducted. The human resources department undertakes random checks of records annually to ensure this policy is being upheld.
- 5.2 In addition to this, Rodd & Gunn appoint a third-party organisation to carry out on-site inspections of our suppliers' facilities to help identify possible risks or violations.

#### **6. Monitoring & Remediation**

In the rare instances that underage workers are found working directly or indirectly at a suppliers' facility, an effective remediation plan is to be put in place and the cause understood, to prevent the issue from reoccurring. The remediation procedure process is outlined below.

## CHILD & FORCED LABOUR REMEDIATION PROCESS

Rodd & Gunn follow the Ethical Trading Initiative's [practical guidance](#) for remediation.





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### MIGRANT WORKER RECRUITMENT POLICY

#### 1. Introduction

Many industries, including the Garment and Textile sectors, oftentimes rely on migrant worker recruitment to fill labour gaps and retain competitiveness. Certain regions & sectors rely on migrant labour recruitment more than others, and responsible mechanisms are not always in place to an extent which affords adequate protection for workers.

Desperate for better wages, vulnerable workers may easily agree to employment conditions they do not fully understand or pay fees along the recruitment process to secure employment. As such, many migrant workers around the world continue to face significant risks of exploitative recruitment practices, which can lead to debt bondage and other potential human rights abuses.

Rodd & Gunn believe it is our shared responsibility to undertake appropriate human rights due diligence in our supply chains, and together with industry and business partners, work on identifying and acting upon potential and actual practices which put vulnerable workers at risk.

#### 2. Purpose

The purpose of this policy is to drive collaboration and cooperation between industry, businesses and individuals along the value chain, to align on best practice and to adopt responsible recruitment practices that respect the rights and dignity of all migrant workers employed in our supply chains.

As of July 2023, Rodd & Gunn made a formal **Commitment** by becoming a signatory to the [AAFA / FLA Apparel & Footwear Industry Commitment to Responsible Recruitment](#), with the aim to create conditions so that:

- No workers pay for their job
- Workers receive a timely refund of fees and costs paid to obtain or maintain their job;
- Workers retain control of their travel documents and have full freedom of movement; and
- All workers are informed, in a language they understand, of the basic terms of their employment before leaving their country of origin.

These same commitments are embedded into Rodd & Gunn's Supplier Code of Conduct and lay the foundations for this policy. All additional guidance in this policy is in line with:

- o [ILO General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs](#)
- o [the Employer Pays Principle](#)
- o [HRC and AIM PROGRESS - Guidance on the Repayment of Worker-paid Recruitment Fees and Related Costs](#)

#### 3. Scope

This policy applies to all businesses (here forth referred to as "Suppliers") actively supplying Rodd & Gunn with finished goods and input materials, whether in direct or indirect business relationship with Rodd & Gunn. All suppliers are expected to implement the principles of this policy in full and follow industry best practice guidelines for creating the conditions outlined in our **Commitment**.

Rodd & Gunn encourage all suppliers to cascade this policy through the upstream supply chain partners to assist in achieving alignment with our values.



## 4. Objectives

### 4.1 Uphold the ILO Guidelines for fair recruitment

#### ***Suppliers and Labour Recruiters shall take steps to prevent abusive or unfair recruitment by***

- i. respecting human rights when recruiting workers, including through human rights due diligence assessments of recruitment procedures, and address adverse human rights impacts with which they are involved.
- ii. undertaking recruitment to meet established labour market needs and never as a means to displace or diminish an existing workforce, lower wages or working conditions, or otherwise undermine decent work.
- iii. never charging recruitment fees or related costs to recruited workers and jobseekers.
- iv. never retaining passports, contracts or other identity documents of workers.
- v. respecting workers' confidentiality and ensure protection of data pertaining to them.
- vi. developing schemes that drive professional recruitment standards.

#### ***Suppliers shall carry out in-depth due diligence on their Labour Recruiters, and verify that***

- vii. the applicable laws and fundamental principles and rights at work, in compliance with international law and the law in the worker's country of origin, the country of transit and the country of destination, and with international labour standards are respected.
- viii. bilateral or multilateral migration agreements between the countries concerned are respected.
- ix. the conditions of work and living conditions into which workers are recruited are those that they have been promised.

#### ***Suppliers and Labour Recruiters shall further mitigate unfair recruitment by***

- x. ensuring that written contracts of employment are concluded, and that they are transparent and are understood by the worker
- xi. providing or facilitating effective access to grievance and other dispute resolution mechanisms in cases of alleged abuses in the recruitment process, and to appropriate remedies.
- xii. providing all workers, whatever their employment status, with the protection provided for in labour law and international labour standards as concerns recruitment.
- xiii. ensuring that the right to freedom of association and collective bargaining of recruited workers is respected in the recruitment process.
- xiv. never resorting to labour recruiters or to temporary work agencies to replace workers who are on strike.
- xv. respecting the freedom of migrant workers to leave or change employment or to return to their countries of origin.

### 4.2 Commit to the “Employer Pays Principle”

Adoption of the [Employer Pays Principle](#) by all suppliers is fundamental to combatting exploitation, forced labour, and trafficking of migrant workers in global supply chains.

***“No worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer.”<sup>1</sup>***

According to the ILO, “Recruitment fees or related costs **should not be collected from workers by an employer**, their subsidiaries, labour recruiters or other third parties providing related services. Fees or related costs should not be collected directly or indirectly, such as through deductions from wages and benefits.”<sup>2</sup>

<sup>1</sup> <https://www.ihrb.org/employerpays/the-employer-pays-principle>

<sup>2</sup> ILO, General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs, 2019, p. 28, available at: [https://www.ilo.org/wcmsp5/groups/public/---ed\\_protect/---protrav/---migrant/documents/publication/wcms\\_536755.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---migrant/documents/publication/wcms_536755.pdf)



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### *Definition of Recruitment Fees & Related Costs:*

Recruitment fees encompass all fees paid by workers directly, indirectly or in form of related costs. These costs may occur as a one-time payment, recurring or ad-hoc payments made for a range of employment-related purposes.

The ILO defines recruitment fees and related costs as “**any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection.**”<sup>3</sup>

#### Examples of **Recruitment Fees**:

- o payments for recruitment services offered by labour recruiters, whether public or private, formal or informal
- o payments made in the case of direct recruitment by the employer; or
- o payments required to recover recruitment fees or related costs from workers

#### Examples of **Related Costs**:

- o Medical
- o Insurance
- o Skills and Qualifications
- o Training and Orientation
- o Equipment
- o Travel and Lodging
- o Administrative and Personal Documents
- o Local Travel Costs to & from Recruitment Offices

The full description and definition of applicable fees can be found in [ILO's Definition of recruitment fees and related costs](#).

## 5. Strategies & Actions

- 5.1 Suppliers are expected to adhere to this policy and establish their own internal policies, systems and procedures to implement the requirements and monitor effectiveness on a regular basis.
- 5.2 Suppliers should conduct proper due diligence on their internal recruitment & selection processes, including in-depth verification of any Labour Recruiter's suitability and license status before entering or renewing agreements.
- 5.3 Before workers sign a contract and are sent to the destination country, suppliers and their Labour Recruiters ensure that all workers are trained & briefed on
  - the company details, workplace, working & living conditions.
  - the terms of employment, conditions of termination & repatriation.
  - the pre-departure legal requirements (e.g. medical tests, visa applications, work permits).
  - the grievance reporting channels available to workers in the sending and receiving countries.
  - the facilities' internal policies, including “The Employer Pays Principle”.

and that

- workers understand their legal rights and protections afforded to them under local law.
- in-depth awareness sessions are conducted with the workers to help them understand all terms and conditions of their employment and test their knowledge periodically.
- worker surveys are conducted for each recruitment cycle to help identify and remedy any cases of recruitment fees paid by workers.

All communication with prospective workers must be in the workers' own language and understandable. Best practice is to conduct briefings in person, using facility-provided content and relevant records to be kept.

<sup>3</sup> ILO, General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs, 2019, p. 12, 28, available at: [https://www.ilo.org/wcmsp5/groups/public/---ed\\_protect/---protrav/---migrant/documents/publication/wcms\\_536755.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---migrant/documents/publication/wcms_536755.pdf)



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- 5.4 Suppliers should establish systems check lists to adequately identify, prevent and manage any shortcomings in Labour Recruiter's practices related to: recruitment & hiring process, fees & expenses paid, contracts of employment, document retention and deposits.
- 5.5 Suppliers should ensure that housing standards and working conditions are, at a minimum, in line with the Rodd & Gunn Supplier Code of Conduct, as well as local and international standards, laws or regulations.

Suppliers are expected to establish effective grievance procedures to ensure any worker can submit their grievance or complaint without fear of retaliation of any kind. All grievances must be recorded and fully investigated.

## 6. Remediation

When recruitment fees are reported or found to be paid by workers, suppliers shall follow the following steps as outlined by HRC and AIM PROGRESS in the [Guidance on the Repayment of Worker-paid Recruitment Fees and Related Costs](#):

1. Commit to remediating recruitment fees
2. Investigate recruitment fees and costs paid by workers
3. Understand who is eligible for payment
4. Calculate the repayment amount
5. Timeline of repayment
6. Engage and communicate with workers
7. Verify payment

Further information with detailed goals and actions are available in the [Guidance](#) document.

## 7. Monitoring

### SUPPLIER MAPPING & RISK ASSESSMENTS

Rodd & Gunn commit to continuously track and monitor our supplier locations, migrant worker profiles and recruitment agencies used. The information gathered through this process is aimed at providing key inputs into internal labour rights risk assessments and informing potential targeted monitoring activities or industry initiatives to partake in.

### MONITORING OF RECRUITMENT PRACTICES

Rodd & Gunn commit to evaluate our suppliers on their recruitment practices and where necessary, carry out in-depth monitoring activities.

This monitoring may occur in the form of scheduled or non-scheduled visits to our Suppliers' associated facilities and worker housing. Off-site interviews with workers, remote surveys or worker-driven monitoring may be conducted.

Monitoring activities shall include assessing the effectiveness of existing grievance mechanisms and remedy pathways available to migrant workers.

Rodd & Gunn adopt a **ZERO TOLERANCE** approach towards retaliation or intimidation of any kind resulting from workers reporting fees or other grievances.

## 8. Industry Collaboration

Rodd & Gunn commit to collaborate and engage with our Suppliers, Industry Bodies, Multi-Stakeholder Groups, NGO's, Civil Society and Labour Rights experts on initiatives focused on identifying, mitigating and addressing poor recruitment practices in the industry.

Where possible, we aim to collaborate with other apparel companies on shared initiatives and monitoring activities of same suppliers or sourcing regions.





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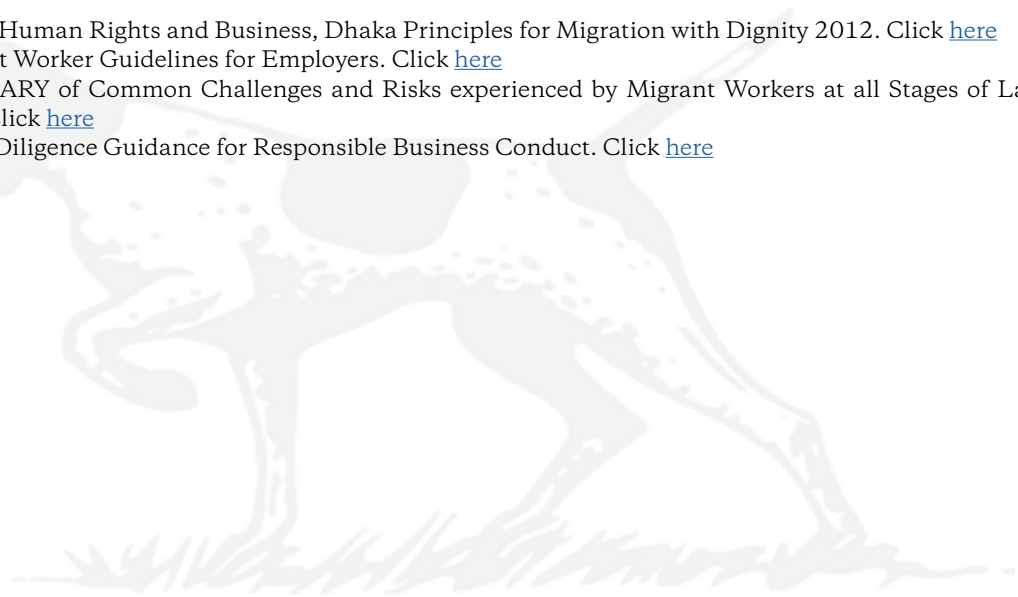
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### Abbreviations

AAFA	American Apparel & Footwear Association	<a href="https://www.aafaglobal.org">https://www.aafaglobal.org</a>
FLA	Fair Labor Association	<a href="https://fairlabor.org">https://fairlabor.org</a>
ILO	International Labour Organization	<a href="http://www.ilo.org">www.ilo.org</a>
HRC	Human Rights Coalition	<a href="https://www.theconsumergoodsforum.com/social-sustainability/human-rights-ending-forced-labour/">https://www.theconsumergoodsforum.com/social-sustainability/human-rights-ending-forced-labour/</a>

### Further reading & resources

- Institute for Human Rights and Business, Dhaka Principles for Migration with Dignity 2012. Click [here](#)
- IOM Migrant Worker Guidelines for Employers. Click [here](#)
- IOM SUMMARY of Common Challenges and Risks experienced by Migrant Workers at all Stages of Labour Migration. Click [here](#)
- OECD Due Diligence Guidance for Responsible Business Conduct. Click [here](#)





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### RESPONSIBLE COTTON SOURCING POLICY

Rodd & Gunn's manufacturers and mills source cotton in various forms from around the world. While child & forced labour remains endemic in many countries, this policy aims to address specific geographical areas which have been identified as high risk to human rights violations.

Rodd & Gunn herewith set clear expectations on responsible cotton sourcing for its suppliers to prevent poor labour practices from occurring in our supply chain.

#### 1. Uzbekistan & Turkmenistan

Governments in Uzbekistan and Turkmenistan collectively force over one million citizens to labour in each country's cotton fields every year. The governments have a tendency to shut down schools and public offices for months at a time, mobilize their country's youth, teachers, nurses, and civil servants, and send them to the fields to harvest cotton. They can be expelled, fired, or lose benefits if they don't fill their daily quotas of harvested cotton.

It is Rodd & Gunn's expectation that our suppliers & mills **do not knowingly source Cotton from Uzbekistan and Turkmenistan** and that all efforts are made to communicate our concern to the entire supply chain. We will continue this requirement until we have seen evidence that progress has been made to end the use of child & forced labour in these countries.

#### 2. Xinjiang Province, China

With recent emergence of human rights concerns in China's most prominent Cotton producing region, XINJIANG PROVINCE, Rodd & Gunn made a commitment to immediately address any potential human rights risk in our supply chain.

It is alleged that 1 million 'Uyghurs' people (Muslim Ethnic Minority) are being removed from their homes and put in detention / re-education camps. Their passports are being seized and many are being forced to work for the textile industry in the region.

Since this development, the United States of America enacted **The Uyghur Forced Labor Prevention Act** (Public Law No. 117-78), also known as the **UFLPA**, which came into effect on June 21, 2022. The act prohibits the importation of goods into the United States manufactured wholly or in part with forced labour in the People's Republic of China, especially from the Xinjiang Uyghur Autonomous Region.

Rodd & Gunn expect all suppliers and mills to **not knowingly source Cotton or Cotton products that are connected to any kind of forced labour of the Uyghurs people in Xinjiang Province, China.**

#### 3. Recommended Sources

The following regions & initiatives have been identified as our preferred sources of Cotton. We strongly encourage all suppliers and mills to initiate these alternatives throughout their own operations and collaborate with upstream suppliers on effective implementation.

- American & Egyptian Cotton (e.g. Supima, Cotton USA, Pima, Giza)
- Australian Cotton (e.g. My BMP, Good Earth Cotton)
- Brazil / Turkish Cotton
- GOTS / OCS Cotton



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### 4. Implementation & Enforcement

It is the responsibility of our garment manufacturers and mills to share this policy with upstream inputs suppliers and to ensure all expectations are communicated.

To prevent and mitigate use of Cotton made under forced labour, Rodd & Gunn require all supply chain partners to:

- establish necessary due diligence protocols and systems on their own supply chain,
- effectively trace their cotton suppliers and cotton lint, and
- actively mitigate risks.

Rodd & Gunn further encourage suppliers to adopt the [YESS Standards for Spinning & Fabric Mills](#), issued by the Responsible Sourcing Network.

**PLEASE NOTE:** Suppliers and mills are required to maintain accurate chain of custody for all cotton inputs and share relevant data and documentation with Rodd & Gunn when requested. Rodd & Gunn encourage suppliers and mills to adopt digital platforms that further verify and enhance the traceability of the raw fibre.

In the event that violations to this policy are uncovered, Rodd & Gunn will work collaboratively with our suppliers, industry bodies and/or NGO's to create a corrective action plan (CAP). Suppliers that are unwilling or unable to fulfill the requirements of this policy will undergo an extensive review and if no satisfactory solution can be found, the decision may be made to terminate the business relationship.

### 5. Policy Review

We continue to be guided by relevant industry bodies, civil society organisations, NGOs and government reports on the prevalence of forced labour in Cotton supply chains and adjust this policy as needed.



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### ANIMAL WELFARE POLICY

#### 1. Purpose

Rodd & Gunn acknowledge the welfare and dignity of animals during the production of materials for our garments. This policy has been developed to ensure that there is a commitment in all facets of our production to the well-being and comfort of animals through suppliers and their sourcing practices. Rodd & Gunn require our suppliers to commit to the standard set by this policy within their own operations and work with us on maintaining and upholding the rights and prosperity of animals in our supply chain.

#### 2. Scope

This policy applies to all levels of the supply chain, including but not limited to: agents/suppliers/factories, fabric/yarn mills, fibre processors, traders/brokers, abattoirs and husbandries.

#### 3. Objectives

Rodd & Gunn expect our suppliers at every point within our supply-chain to respect all animals under the principles set by the five freedoms.

The five freedoms are internationally recognised recommendations on animal welfare, set out by the World Organisation for Animal Health (OIE):

- i. Freedom from hunger & thirst
- ii. Freedom from discomfort
- iii. Freedom from pain, injury and disease
- iv. Freedom to express normal behaviour
- v. Freedom from fear and distress

#### 4. Strategies

Suppliers that source **WOOL FIBRES OR WOOLLEN PRODUCTS** must ensure that;

- a. All animal fibre is sourced from farmers/brokers who uphold the five freedoms of animal welfare.
- b. The wool is sourced through recognised industry standards where possible or requested.
- c. Preference is given to wool of New Zealand and Australian origin where possible.
- d. Fibre origin can be traced and verification is available for each order.
- e. A clear preference for non-mulesed or cease-mulesed wool is established and mulesing status is declared on IWTO test certificates.
- f. Regenerated and/or recycled fibre-use is encouraged and verification through recognised standards is available.

Suppliers of **ANIMAL SKINS OR LEATHER GOODS** must ensure that;

- g. Animal skins are a by-product of the meat industry, which includes shearling or hair on leather if used.
- h. Origin of raw hide can be traced and verification is available for every order.
- i. Animal skins (raw & tanned) are sourced from certified tanneries where possible.
- j. Where practical, vegetable tanned or other ecologically mindful methods are encouraged over the use of traditional chrome tanning.



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Suppliers that source **DOWN/FEATHER FILL** for Rodd & Gunn products must ensure that;

- k. The down/feather fill used is responsibly sourced and certified within all products and verification documents are provided for each order.
- l. Under no circumstances should live plucking, molt harvesting or force feeding be practiced.

Suppliers of **CASHMERE FIBRES OR PRODUCTS** must ensure that;

- m. Fibres are sourced from farmers certified with responsible standards of operation & verification documents are available for each order.
- n. Regenerated and/or recycle fibre-use is encouraged and verification is available.

Concerning all **OTHER ANIMAL FIBRES** not specifically mentioned in this policy, suppliers must ensure that;

- o. All principles of animal welfare, ethics and environmental perspectives are upheld.
- p. Origin of fibre/material is disclosed and able to be verified with documentation.

## 5. Zero Tolerance

Fur, farmed fur, vulnerable or endangered species that appear on the Convention on International Trade in Endangered Species as well as **IUCN Red List** of threatened species are prohibited from use in Rodd & Gunn products.

## 6. Monitoring & Compliance

Suppliers must ensure that all animal fibres and products can be traced to their origin and verification of applicable certification standards can be provided. Examples of acceptable documents are:

- Certificate of origin
- IWTO test certificate
- Scope certificate / Standard certificate
- Transaction certificates
- Purchase invoice

Examples of acceptable fibre/product certifications can be found in the **Table 1.2** further below. In the event that suppliers are unable to adhere to the requirements stated above, Rodd & Gunn will work collaboratively with our suppliers to ensure strategies are in place to help achieve our objectives.

Failure to adhere to any zero-tolerance parameters stated above could lead to termination of a supplier contract, rejection of delivered product and costs to be covered by the supplier.

**Table 1.1: Abbreviations**

<b>OIE</b>	World Organisation for Animal Health	<a href="http://www.oie.int">www.oie.int</a>
<b>IUCN</b>	International Union for Conservation of Nature	<a href="http://www.iucn.org">www.iucn.org</a>
<b>TE</b>	Textile Exchange	<a href="https://textileexchange.org">https://textileexchange.org</a>



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**Table 1.2: Acceptable animal welfare standards**

CATEGORY	STANDARD		WEBSITE
WOOL	RWS	TE Responsible Wool Standard	<a href="http://textileexchange.org/standards/responsible-wool">http://textileexchange.org/standards/responsible-wool</a>
	GOTS	Global Organic Textile Standard	<a href="https://global-standard.org">https://global-standard.org</a>
	ZQ MERINO	The New Zealand Merino Company	<a href="https://www.discoverzq.com">https://www.discoverzq.com</a>
	AUTHENTICO	The Schneider Group	<a href="https://www.gschneider.com/authentico/">https://www.gschneider.com/authentico/</a>
LEATHER / ANIMAL SKINS	LWG	Leather Working Group	<a href="http://www.leatherworkinggroup.com">www.leatherworkinggroup.com</a>
	OTLS	Oeko-Tex Leather Standard	<a href="https://www.oeko-tex.com/en/our-standards/leather-standard-by-oeko-tex">https://www.oeko-tex.com/en/our-standards/leather-standard-by-oeko-tex</a>
DOWN / FEATHER	RDS	TE Responsible Down Standard	<a href="https://textileexchange.org/standards/responsible-down/">https://textileexchange.org/standards/responsible-down/</a>
	THERMORE	Thermore Eco Down	<a href="https://www.thermore.com/en/">https://www.thermore.com/en/</a>
CASHMERE	GCS	Global Cashmere Standard	<a href="http://thegoodcashmerestandard.org">http://thegoodcashmerestandard.org</a>
RECYCLED	GRS	TE Global Recycled Standard	<a href="https://textileexchange.org/standards/recycled-claim-standard-global-recycled-standard/">https://textileexchange.org/standards/recycled-claim-standard-global-recycled-standard/</a>
	RCS	TE Recycled Claim Standard	<a href="https://textileexchange.org/standards/recycled-claim-standard-global-recycled-standard/">https://textileexchange.org/standards/recycled-claim-standard-global-recycled-standard/</a>
OTHER	RAS	TE Responsible Alpaca Standard	<a href="https://textileexchange.org/standards/responsible-alpaca-standard/">https://textileexchange.org/standards/responsible-alpaca-standard/</a>

Other standards / certifications not listed above may be accepted upon discussion / approval with Rodd & Gunn.



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## GRIEVANCE POLICY

### 1. Introduction

Rodd & Gunn have a responsibility to ensure the workers who harvest and manufacture our raw materials / fabrics / garments are treated fairly and have access to safe working conditions. Therefore, we have created a communication channel whereby workers employed by a Rodd & Gunn contracted Factory, Mill or Farm can have direct access to report their grievances.

### 2. Implementation

A grievance mechanism in the form of an email address [support@roddandgunn.com](mailto:support@roddandgunn.com), accessible directly or via QR code / We Chat, has been created specifically to provide workers with direct access to the company's CEO and Creative Director. This mechanism will be made available to the workers through the following avenues:

- a. All Factory / Mill and Farm managers are required to display the grievance mechanism in a prominent staff location in the local language such as: break room, dormitory, restroom or company noticeboard. [see Appendix A: Worker Grievance Notice]
- b. Factory / Mill / Farm managers are to facilitate regular training for their staff & workers on how to use the grievance mechanism.
- c. When the Factory / Mill or Farm undergo a 3rd party audit, it will be a requirement of the Auditor to verify that the grievance mechanism has been made available to the workers and is on display in the local language. The Auditor will also be required to disclose the grievance mechanism to the worker / union representative or a worker undergoing an anonymous worker survey.
- d. When a Rodd & Gunn representative visits a contracted facility the grievance mechanism must be sighted and on display.

### 3. Resolution

In the event that a grievance has been lodged an automatic response will be generated to confirm that the email has been received, the contents will remain confidential and assurance that the matter will be treated with top priority. Rodd & Gunn will then evaluate the grievance and decide on an appropriate course of action that will not be harmful to either the facility or the worker, but focuses on resolving the issue and improving the working conditions.

Communicating via email allows both parties to digitally translate into their local language and provides a platform in which Rodd & Gunn can maintain communication with the worker who raised the grievance. Workers' identity must remain confidential, and retaliation of any kind against workers or employees is strictly prohibited.

To ensure the issue remains resolved Rodd & Gunn will monitor & assess the situation by means of 3rd party auditing. The Auditor conducting the assessment will be asked to report back to Rodd & Gunn on their findings with recommendations for further corrective actions if required.

### Remedy Process

We adopt the Ethical Trade Initiative (ETI) [practical guidance](#) for remediation.



# RODD & GUNN®

## NEW ZEALAND

### SUB-CONTRACTOR POLICY

To ensure consistency and high-quality standards throughout all orders, Rodd & Gunn do not permit the use of sub-contracted production without explicit written permission as per the approval procedure set out below.

The term “sub-contracting” in this policy generally refers to specialised processes such as: embroidering, printing, washing, dying, but does not exclude other manufacturing processes of goods, in whole or parts thereof.

Whenever a sub-contracted process can't be avoided, suppliers must first seek written approval from Rodd & Gunn before engaging business with any sub-contractor. Only pre-approved facilities may be used for samples & bulk orders, without exception.

It is the supplier's responsibility to ensure all manufacturing standards and Code requirements are adhered to in the sub-contracted facility. The standards are set out in **Rodd & Gunn's Supplier Manuals** and it is the suppliers' responsibility to ensure all standards are communicated to sub-contractors.

Suppliers will be asked to demonstrate sub-contractor compliance against our Supplier Code of Conduct during a factory inspection or 3rd party audit or site visit, which may be announced or **unannounced**.

#### 1. Unauthorised Sub-Contracting

**IMPORTANT NOTE** - The use of **UNAUTHORISED** sub-contracting is **strictly prohibited** in any stage of production of a Rodd & Gunn order. We define an 'unauthorised sub-contractor' as:

- an individual or business that agrees to perform part or all of the obligations of the main supplier's contract (PO), whether in writing or not, and
- who has not been approved by Rodd & Gunn as a sub-contractor prior to the agreement being made.

If a case of unauthorised sub-contracting is found, Rodd & Gunn reserve the right to immediately and permanently terminate a business relationship.

#### 2. Approval Procedure

To seek approval for sub-contractor use, suppliers are required to:

1. submit the **Sub-Contractor Profile & Approval Form** for each facility, included in **Appendix B**
2. submit photos of translated Supplier Code of Conduct & Worker Grievance Notice displayed at sub-con facility.
3. submit any current certifications & social audit reports, internal assessments or evidence of due diligence carried out.





# RODD & GUNN®

## NEW ZEALAND

### CHEMICAL MANAGEMENT

Rodd & Gunn recognise the importance of protecting our environment and ensuring our products do not cause harm to our planet or people, whether it be during the manufacturing process, use-phase or a product's end-of-life.

Alongside industry best-practice RSL & MRSL standards, various regulations around the globe seek to address the management and elimination of specific chemicals & chemical groups that are either known or suspected to have adverse effects on our environment and human ecological health.

## 1. Minimum Requirements

All goods supplied to or manufactured for Rodd & Gunn are expected to:

1. hold a valid [Oeko-Tex Standard 100](#) certification for the product category or its input components,
2. meet the requirements of the latest [Bluesign RSL](#) (Restricted Substance List)
3. meet the requirements of the latest [ZDHC MRSL](#) (Manufacturing Restricted Substance List)
4. comply with [EU REACH Regulation \(EC\) No 1907/2006](#) (e.g. SVHC's and substances listed in Annex XVII)
5. comply with [EU POPs Regulation \(EU\) No 2019/1021](#) (Persistent Organic Pollutants)
6. comply with the California Proposition 65 Regulation
7. not exceed limit values for Chromium VI, Heavy Metals and other restricted chemicals, typically associated with leather goods
8. not contain any "forever chemicals" such as Per- and polyfluoroalkyl substances (PFAS) as intentionally added chemicals
9. comply with all other national or international laws & regulations in relation to the product.

## 2. Monitoring

Suppliers and mills shall maintain accurate records of input chemicals used in their own production processes. Suppliers and mills must inform Rodd & Gunn immediately of any goods that are likely to contain or are made with restricted substances of any kind.

Suppliers and mills are encouraged to use one of the examples for monitoring compliance listed in the table below. Other types of monitoring may be acceptable upon discussion/approval with Rodd & Gunn.

Standard / Regulation	Examples of approved conformance (aim for at least one)	Validation
<b>RSL</b>	<ul style="list-style-type: none"><li>• Oeko-Tex Std 100 certified product line or input materials</li><li>• Bluesign System Partner</li><li>• RSL Product Testing via accredited 3rd party lab*</li></ul>	<ul style="list-style-type: none"><li>• Oeko-Tex Certificate</li><li>• Bluesign Certificate</li><li>• Lab Test Report</li></ul>
<b>MRSL</b>	<ul style="list-style-type: none"><li>• ZDHC Roadmap to ZERO program partner</li><li>• Bluesign System Partner</li><li>• MRSL Wastewater/Sludge Testing via accredited 3rd party lab</li></ul>	<ul style="list-style-type: none"><li>• ZDHC Signatory</li><li>• Bluesign Certificate</li><li>• Wastewater Test Report</li></ul>
<b>EU REACH Annex XVII</b>	<ul style="list-style-type: none"><li>• Oeko-Tex Std 100 certified product line or input materials</li><li>• REACH Product Testing via accredited 3rd party lab*</li></ul>	<ul style="list-style-type: none"><li>• Oeko-Tex Certificate</li><li>• Lab Test Report</li><li>• Supplier Declaration</li></ul>
<b>EU POPs Regulation</b>	<ul style="list-style-type: none"><li>• Oeko-Tex Std 100 certified product line or input materials</li><li>• EU POPs Product Testing via accredited 3rd party lab*</li></ul>	<ul style="list-style-type: none"><li>• Oeko-Tex Certificate</li><li>• Lab Test Report</li><li>• Supplier Declaration</li></ul>
<b>Proposition 65</b>	<ul style="list-style-type: none"><li>• Prop 65 Product Testing via accredited 3rd party lab* against listed chemicals</li></ul>	<ul style="list-style-type: none"><li>• Lab Test Report</li><li>• Supplier Declaration</li></ul>
<b>PFAS - Free</b>	<ul style="list-style-type: none"><li>• PFAS Product Testing via accredited 3rd party lab*</li></ul>	<ul style="list-style-type: none"><li>• Lab Test Report</li><li>• Supplier Declaration</li></ul>



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Standard / Regulation	Examples of approved conformance (aim for at least one)	Validation
Chromium VI + other metals	<ul style="list-style-type: none"><li>LWG certified tannery (dying/finishing)</li><li>Product Testing via accredited 3rd party lab*</li></ul>	<ul style="list-style-type: none"><li>LWG Certificate</li><li>Lab Test Report</li></ul>

**Please note:** this list is not exhaustive and may evolve over time. It is the supplier's responsibility to keep up to date with any market-specific regulatory changes or additions that may occur between policy updates and manage product compliance accordingly.

### \* RSL PRODUCT TESTING

- All product testing shall be carried out using the nearest SGS lab, or another pre-approved and accredited test lab if SGS lab is not represented in your country or area.
- The [Bluesign RSL](#) limit values (per usage range A,B or C) and test methods shall be applied according to product type.
- To understand which tests are to be performed, suppliers shall follow the [AFFIRM testing protocol](#) for Level 1 and 2 of the respective product/fibre type.

## 3. Non-Compliance

Rodd & Gunn reserve the right to cancel the order or, if the product is already delivered, return the order to the supplier if the product is found to not comply with any of the above listed standards/regulations. Any associated costs or losses are the supplier's responsibility.

## 4. Continuous Improvement

As part of Rodd & Gunn's commitment to continued improvement, periodic unannounced testing of products / auditing of facilities may be deployed. We encourage our Supply Chain partners to also invest in innovation, research and development that elevates their compliance and drives positive environmental impacts.

Suppliers and mills are also encouraged to utilise independent or industry-led resources (such as [Chemsec tools](#) or [ZDHC Gateway](#)) for their selection of approved chemicals.