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 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 has 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 semi-unannounced on-site inspections during the mandatory factory auditing process.

6. Monitoring & Remediation

In the rare instances that underage workers are found working directly or indirectly for your 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 LABOUR REMEDIATION PROCESS

On-site Investigation
- Third party auditor conducts factory audit
- Child labour verified by auditor

Immediate On-site Action
- Child labour identified on site
- Remove the child from the workplace and keep him/ her in a safe place until a remediation plan has been agreed
- Obtain detailed information about the child
- Immediately inform CEO of RODD & GUNN

Commence Investigation
- Discussion with the auditor / supplier / factory to draft a remediation plan
- RODD & GUNN to prepare a summary of the situation to report to the CEO of RODD & GUNN
- Notify all business areas within the organisation to cease all orders until a Child Labour CAP has been put in place

Agreement on Remediation Plan
- RODD & GUNN to consult with a third-party organisation or NGO to establish an appropriate remediation plan
- RODD & GUNN Production Manager and CEO to conduct a meeting with the supplier / factory to discuss the remediation plan
- Draft a remediation plan with the agreement of the supplier / factory and RODD & GUNN

AGREE
- Supplier / Factory / Child are willing to participate in the remediation plan
- Rodd & Gunn to monitor the implementation of the remediation plan
- Consult a third-party organisation to conduct a follow up audit

DISAGREE
- All orders must be removed from the factory
- Ensure the child returns to their hometown accompanied by a parent / guardian

Closure of the remediation plan
- Provide a summary to the CEO of RODD & GUNN outlining that the remediation plan is now closed
FORCED LABOUR REMEDIATION PROCESS

ONSITE INVESTIGATION
- Gathering and securing information
- Identification and escalation of forced labour cases

INCIDENCES CAN BE RESOLVED WITH EMPLOYER
- Corrective action with employer

INCIDENCES LINKED WITH VIOLENCE OR CRIMINALITY
- Referral to authorities or expert organisations

NON-COMPLIANCES ARE NOT RESOLVED
- Develop multilateral remediation strategy with national actors and wider stakeholders or refer to authorities if appropriate

VICTIM SAFEGUARDING

VIABLE LEGAL PATHWAY TO REMEDIATION IS AVAILABLE
- Refer to national authorities

LEGAL PATHWAY IS NOT SAFE OR CREDIBLE
- Refer to expert organisation

REHABILITATION OR MATERIAL SUPPORT

RESTITUTION OR COMPENSATION

PREVENTION: Addressing root causes & establishing or maintaining grievance resolution mechanisms

REMARKS:
- Inspectors, first responders, interpreters and experts should be trained and sensitized on risks faced by vulnerable populations
- Important to fully understand national pathways to remediation, how it works and what outcomes can be expected
- Engage in collaborative interventions to address root causes and prevent further abuses
- Grievance mechanisms and worker voice systems deter further abuses
GENDER EQUALITY POLICY

1. Purpose
Rodd & Gunn recognises the importance of addressing gender equality in our supply chains. While demographics vary among countries, the modern apparel sector has always been dominated by female workers. This policy aims to provide gender specific requirements and strategies to prevent discrimination & inequality faced by women in the apparel industry.

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 the standards as defined in section 1.7 of the Code of Conduct, in conjunction with the additional policy objectives listed below.

3. Objectives

3.1 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 continued employment.
- Equal opportunities for women and men shall be provided in all aspects of training and personal and professional development.

3.2 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.

3.3 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.

4. Strategies

4.1 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.
4.2 Rodd & Gunn encourage suppliers to promote female representation in leader positions & worker representation groups.
4.3 Regular on-site audits in production facilities will provide close monitoring on gender discrimination & female worker empowerment.

5. Actions

5.1 Rodd & Gunn expects suppliers to communicate this policy within their own facilities and with the extended supply chain.
5.2 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.

6. Monitoring
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.
RESPONSIBLE COTTON SOURCING POLICY

1. Purpose
Rodd & Gunn’s manufacturers and mills source cotton in various forms from around the world and we share a collective responsibility for preventing poor labour practices from occurring in our supply chain.

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.

2. Scope
This policy applies to all suppliers of Rodd & Gunn products, and their sub-facilities involved in the production (including textile production and raw material farms/facilities).

3. Objectives

3.1 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.

It is Rodd & Gunn’s expectation that our suppliers & mills will 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.

3.2 Xinjiang Province, China
With recent emergence of human rights concerns in China’s most prominent Cotton producing region, Xinjiang province, Rodd & Gunn have made a commitment to immediately address any potential human rights risk in our supply chain.

Rodd & Gunn requires all of its suppliers 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.

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

- American & Egyptian Cotton (e.g. Supima, Giza, Pima, Cotton USA)
- Australian Cotton (e.g. my BMP & Cotton Australia)
- BCI Cotton

5. Actions
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. Rodd & Gunn expects all suppliers to carry out their own due diligence and risk assessment of Cotton sources and provide information as required.

Suppliers are expected to cooperate with Rodd & Gunn on specific sourcing programs and provide relevant documentation for verification (chain of custody).

6. Monitoring & Remediation
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.
WORKER GRIEVANCE POLICY

1. Purpose

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. 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. Objective

A grievance mechanism in the form of an email address 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:

4. Strategies

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.

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.

5. Actions

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.

6. Monitoring & Remediation

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.