

BRAND ARCHITEKTS - ETHICAL POLICY

1. Introduction

Brand Architekts has created an Ethical Policy in order to ensure that both its organisation and its suppliers manufacture and supply safe, legal products that meet statutory and customer requirements and that business is conducted in accordance with Industry and internationally approved Standards of good ethical, employment and environmental practice.

The Ethical Policy is designed to ensure that Brand Architekts, its partners and its suppliers operate within the principles and guidelines as laid down in the Policy.

The procedures contained in this document ensure that Brand Architekts operates best practice in the application of the Policy and ensures that Brand Architekts abides by its core principles.

Brand Architekts is committed to eliminating acts of modern-day slavery and human trafficking within its business and within its multi-tier supply chains, including sub-contractors. The Company acknowledges its responsibility in the context of the Modern Slavery Act 2015 and will ensure transparency within the organization and its supply chain.

Brand Architekts conducts its business according to the standards of good ethical, employment and environmental practice contained in this policy and Brand Architekts expects its suppliers and partners to operate on the same principles. Specifically, Brand Architekts expects its suppliers (and their sub contractors) to observe best practice and continuing improvement in the fields set out below, and in any other areas notified by Brand Architekts from time to time.

2. Scope of Application

This code is to be applied within Brand Architekts and to direct suppliers, who in turn will be required to supervise their suppliers and sub contractors in the same terms.

Brand Architekts accepts that it may be difficult to exert control or influence over small volume or short-term suppliers but will take all reasonable steps to ensure compliance within this part of the supply base.

As part of the company's due diligence processes, slavery and human trafficking risk control is a core aspect of the supplier approval process. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

Brand Architekts also carries out detailed checks within its own employment practices and with its labour agency partners and service subcontractors.

Where Brand Architekts deals with large company suppliers (over which it cannot reasonably exert control or influence) which operate their own Social Codes of Conduct, Brand Architekts will expect those companies to demonstrate the conformance of their supply base to the company's code. Brand Architekts does not expect companies' codes to apply outside their

Document approved by:

Chief Executive Officer:
Date:

own scope of reasonable control and influence.

To execute this policy, Brand Architekts ensures its staff have appropriate knowledge and understanding.

3. International and National Laws

In applying this code Brand Architekts requires adherence to the specific requirements for social accountability as laid out in the International Standard - Social Accountability 8000 (SA8000), the Ethical trade base code (ETI) and that the following International Instruments (Conventions and Recommendations) be followed:

- ILO Conventions 29 and 105 and Recommendation 35 (Forced and Bonded Labour)
- ILO Convention 87 (Freedom of Association)
- ILO Convention 98 (Right to Organise and Collective Bargaining) ILO Conventions 100 and 111 and Recommendations 90 and 111 (Equal Remuneration for male and female workers for work of equal value; Discrimination in employment and occupation)
- ILO Convention 138 and Recommendation 146 (Minimum Age).
- ILO Convention 135 and Recommendation 143 (Workers' Representatives Convention)
- ILO Convention 155 and Recommendation 164 (Occupational Safety and Health)
- ILO Convention 159 and Recommendation 168 (Vocation Rehabilitation and Employment/Disabled Persons)
- ILO Convention 183 (Maternity Protection)
- ILO Convention 177 and Recommendation 184 (Home Work).
- Modern slavery act 2015
- Bribery Act 2010

Companies applying this code are expected to comply with national and international laws as applicable and, where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection.

4. Employment of Appropriate Workers

- a. Brand Architekts requires that no forced, bonded or involuntary prison labour be used to produce goods, wholly or in part. Workers shall not be required to lodge deposits, or their identity papers, with their employers.
- b. No worker shall be employed under the minimum age established by local law or the age at which compulsory schooling ends in the country, whichever is the greater. In any event, children under fifteen, or the minimum working age according to International Labour Organisation (ILO) exemptions (under Convention 138), shall not be recruited or employed.

5. General Employment Practices

Brand Architekts requires that:

- a. There is compliance with local legislation regulating employment and working conditions.
- b. Employee working hours comply with local legislation and standards and in any event are not regularly more than 48 standard working hours per week, subject to the right to opt out under regulations 4 and 5 of the Working Times Regulations 1998. In addition, overtime shall not commonly exceed 12 hours per week, shall always be voluntary and shall not be demanded on a regular basis. Each employee is allowed regular rest periods.
- c. Part-time or temporary employment complies with local legislation.
- d. Employees are paid in accordance with local legislation, specifically including any minimum wage, allowances and benefits. All overtime worked shall be paid at premium rates.
- e. All local legislation for sick leave, child care, emergency leave, pregnancy leave, holiday leave and statutory holidays and any similar issues are observed.

6. Working Environment

Brand Architekts believes that the working environment is a safe, hygienic working environment. It therefore requires that the working conditions in places of work comply with the following standards:

- a. All national and local health and safety laws and all of the relevant requirements of ILO convention 155. Where the organisation subscribes to other codes of practice or standards on Health and Safety, these shall also be met.
- b. Assigning of a senior management representative to be responsible for health and safety issues.
- c. No employees shall be subjected to unhealthy or unsafe working conditions and all necessary safety equipment (including personal protective equipment) should be provided free of charge. Fire exits shall be adequate and well identified.
- d. Young people under 18 shall not be expected to work at night or under potentially hazardous conditions.
- e. No one shall be employed in potentially hazardous conditions without receiving adequate safety training and supervision. First aid training should be provided to nominated First Aiders. A First Aider should be available at all times.
- f. Provision for all personnel of clean bathrooms, access to potable water, and, if appropriate, sanitary food storage facilities.

7. Respect for the Individual Worker

Brand Architekts requires compliance with management practices which recognise the dignity of the individual and the right to a workplace free of harassment, abuse and corporal punishment. The company shall not allow behaviour including gestures, language and physical contact that is sexually coercive, threatening or exploitative.

Disciplinary practices shall be clearly set out and communicated to workers. They shall not involve the use of corporal punishment, mental or physical coercion and verbal abuse. Workers shall have the right of appeal and representation at disciplinary hearings.

8. Environmental Standards

- a. Compliance with all relevant environmental standards and legislation requirements.
- b. Brand Architekts is committed to sound environmental practices: it will therefore aim to select suppliers dedicated to making continuous efforts to reduce the impact of their operations on the environment.

9. Code of conduct

Brand Architekts expects that all suppliers operate their businesses at the highest possible ethical levels.

Suppliers should adhere to the following clauses in all of their activities, not only activities relating specifically to the business of Brand Architekts: -

- a. Conduct all business activities ethically and with integrity.
- b. Comply with all applicable legislation and regulations as detailed in section #3.
- c. Maintain the highest professional standards of financial and regulatory reporting.
- d. Ensure high levels of compliance with recognised standards of IT security and consider membership of the UK Government's Cyber Essentials scheme:
 - a. <https://www.gov.uk/government/publications/cyber-essentials-scheme-overview>
- e. Not tolerate or engage in any form of corruption or bribery and comply with all aspects of the Bribery Act 2010.
- f. Not trade with suppliers who do not enforce the principles of this code of conduct in their own supply chain.

10. Equal Opportunities

Brand Architekts operates an equal opportunities policy. All suppliers must confirm that they do not discriminate in hiring, salary, benefits, advancement, provision of training, termination or retirement (or otherwise interfere with the rights of individuals to observe tenets or practices, or to meet their needs) on the basis of any of the protected characteristics within the meaning of the Equality Act 2010 namely age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

11. Freedom of Association and Collective Bargaining

- a. Brand Architekts requires all its suppliers to respect the rights of their employees to freedom of association and to organise collective bargaining in a lawful and peaceful manner, in accordance with ILO conventions (87 and 98).
- b. Where the right to freedom of association and collective bargaining is restricted under law the supplier shall facilitate parallel means of lawful independent and free association and bargaining for such personnel.

12. Breach of these conditions

- a. All suppliers and sub contractors are expected to achieve compliance with this code within a reasonable timeframe as agreed by Brand Architekts.
- b. It is recognised that observance of some provisions of the code may not be immediately realisable in some cases. Some suppliers may not be able to meet all requirements within a short time and in some cases they may be constrained by national law. Reasonable timeframes and the existence of any constraints not controllable by the supplier may be taken into account by Brand Architekts when evaluating compliance. Failure to apply rapid corrective action with respect to certain standards (such as, but not necessarily limited to, the use of forced, bonded or involuntary prison labour, the use of physical abuse or discipline and intimidation) will result in immediate termination of the contract.
- c. Where compliance is not achieved, Brand Architekts will no longer continue to place business with this supplier.

13. Responsibility Documentation and Inspection

- a. All suppliers are expected to maintain on file such documentation as may be needed to demonstrate compliance with the requirements of this Code of Conduct.
- b. Brand Architekts may conduct audits regularly at all facilities used to produce its components, including the facilities of sub-contractors, to determine whether the requirements set out above have been met.

14. Declaration of interest

Any personal connection to a person or group within the supply chain that could potentially lead to accusations of unfair practice must be declared to Brand Architekts. It is recommended that Brand Architekts Head of Supply Chain is regarded as the first point of contact should a declaration need to be made.

Changes to Issue: