

## Ted Baker's Ethical Code of Conduct

### 1. Objectives of the Code

Ted Baker's Ethical Code of Conduct is the minimum standard that all his factories, suppliers, licensees, partners and agents (who he calls his 'Suppliers') must meet. With the support of Ted's Conscience team, Ted expects his Suppliers to continually improve their sourcing practices. Suppliers must ensure these standards are implemented within their own operations and throughout their supply chain as a safeguard to their workers and the environment. As such, all of his Suppliers are strictly required to adhere to the Code.

### 2. Sources of the Code

Ted's Code is based on the following international conventions:

- The Ethical Trading Initiative Base Code;
- The United Nations Universal Declaration of Human Rights;
- The European Convention of Human Rights;
- The Fundamental Conventions of the International Labour Organisation ('ILO'); and
- Modern Slavery Act 2015 (UK legislation).

### 3. Workers' and Human Rights

#### **Employment is freely chosen**

There is no forced, bonded, involuntary or prison labour. Workers are not required to lodge 'deposits' or their identity papers with any party in order to gain employment and are free to leave employment with reasonable notice. Neither the Supplier nor any entity supplying labour to the Supplier shall engage in or support human trafficking.

#### **Freedom of association**

Employees have the right to join or form trade unions of their own choosing and to bargain collectively. The Supplier will adopt an open attitude towards the activities of unions and their organisational activities.

Worker representatives will not be discriminated against and will have access to carry out their representative functions in the workplace. Where the rights to such unions are restricted under law, the Supplier will not hinder the development of alternate organisations for free association and bargaining. The Supplier shall effectively communicate this right to workers.

#### **Working conditions are safe and hygienic**

A safe and hygienic working environment shall be provided. Adequate steps shall be taken to prevent accidents and injuries occurring in the course of work, by minimising the causes of hazards 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.

The Supplier shall appoint a senior management representative to be responsible for ensuring a safe and healthy environment for all workers and for implementing the health and safety elements of this standard, and establish systems to detect avoid or respond to these.

The Supplier shall provide, at its own expense, appropriate personal protective equipment to its Workers and provide first aid training required by local law. Suppliers shall assist the worker in obtaining follow-up medical treatment following any work-related injury.

The Supplier shall undertake to assess all the risks to new and expectant mothers arising out of their work activity and to ensure that all reasonable steps are taken to remove or reduce any risks to their health and safety.

All Workers shall have the right to remove themselves from imminent serious danger without seeking permission from the Supplier.

Access to potable water and toilet facilities and, if appropriate, sanitary facilities for food storage shall be provided. Where provided, accommodation shall be clean, safe, and meet the basic needs of Workers.

#### **Buildings will be structurally safe**

It is the responsibility of the Supplier to provide workers with a safe working environment. All buildings must be structurally safe and suitable for occupation. The Supplier must have evacuation and response procedures prepared to protect the wellbeing of all workers from natural disaster or emergencies.

#### **Child labour will not be used**

There shall be no recruitment of child labour. The Supplier must develop or participate in programmes that enable children to remain in quality education until no longer a child. All policies and procedures relating to child labour shall conform to the provisions of the relevant ILO standards. Young workers shall not be employed at night or in hazardous conditions.

#### **Living wages are paid**

Wages and benefits will meet the minimum national legal standards or industry benchmark standards, whichever is higher. Wages shall always be enough to meet basic needs and to provide some discretionary income.

All employees will be provided with written information about their employment conditions and wages before they enter employment and about the particulars of their wages for the pay period concerned each time they are paid. Deductions from wages as a disciplinary measure are not permitted. All disciplinary measures should be recorded.



**Working hours are not excessive**

Working hours will comply with national laws, collective agreements and benchmark industry standards, whichever affords greater protection. The working hours must not prohibit the worker from enjoying their private and family life.

In any event, workers shall not be required to work in excess of 48 hours per week and will be provided with at least one day off for every 7 day period. Overtime is voluntary, shall not exceed 12 hours per week or be demanded on a regular basis and shall be compensated at a premium rate.

**No discrimination is practiced**

There will be no discrimination in hiring, treatment, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, social origin, religion, age, disability, gender, gender identity, marital status, sexual orientation, birth, family responsibilities, social union membership or political affiliation.

The Supplier shall not allow any behaviour that is threatening, abusive, exploitative, or sexually coercive including gestures, language, and physical contact, in the workplace and where applicable, in residences and other facilities provided by the company for use by personnel.

The Supplier shall not subject workers to pregnancy or virginity tests under any circumstances.

**Regular employment is provided**

Work performed must be on the basis of a recognised working relationship established through national law and practise.

Obligations to workers 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.

**No harsh or inhumane treatment is allowed**

There will be no exploitation of workers. This includes employing workers through dishonesty, the treatment of the worker whilst employed and the right to be free from oppressive treatment once the employment has been terminated. Physical, sexual, mental or verbal abuse is prohibited. As is the threat of any kind of abuse or other forms of intimidation.

**The Code will be upheld by all Sub-Contractors and Homeworkers**

If a Supplier wishes to sub-contract any part of the manufacturing of Ted Baker goods, they must have written permission and consent from Ted Baker. If permission is granted, the Supplier must provide the sub-contractor with a copy of the Code and ensure that all sections of the Code are fully understood by the subcontractor and complied with.

Ted supports the empowerment of women through the provision of 'Homeworking' as part of the manufacturing process. The Supplier should allow Homeworkers to balance the commitments of domestic life with making an independent income. The Supplier must have written permission and consent from Ted Baker to employ Homeworkers when producing Ted Baker product. If permission is granted, the Supplier is responsible for ensuring all Homeworking adheres to the Code.

**Ensure Migrants are employed legally**

Migrant workers must be employed in accordance with the immigration and labour laws of the country of manufacture. The Supplier must have effective systems in place to verify the worker's entitlement to work and their status in the country of manufacture. The Supplier must hold copies of documentation which verifies that the migrant worker can be legally employed.

The migrant workers' right to freedom of movement and communications must not be interfered with and all original documentation necessary to exercise these rights must be left in the possession of the migrant worker.

**Modern Slavery is prohibited**

Ted condemns the practice of Modern Slavery. The Supplier is required to ensure that all reasonable efforts are employed to eliminate Modern Slavery and deceptive practices in the recruitment of workers in their operations, in their subcontractors and within their supply chains including raw material producers. If the Supplier becomes aware of slavery within their supply chain it must notify Ted immediately and comply with the remediation obligations set out in Section 6.

The Supplier should make provisions to accommodate for individuals who are particularly vulnerable to these practices. This includes, but is not limited to; women, migrants and minorities.

**4. Environmental Protection**

Ted is committed to reducing his environmental impact. The Supplier should consider their environmental performance and procedures to minimise any negative impact on the environment, community and natural resources. The Supplier must operate with regard to national laws, regulations, administrative practices and policies relating to the preservation of the environment. All relevant international agreements, principles and standards in relation to the environment must be complied with.

This includes, but is not limited to, the reduction and management of: greenhouse gas emissions, water consumption, waterborne effluent, chemicals, industrial waste and the use of non-renewable resources. The Supplier must provide relevant data if requested to do so by Ted Baker.



## 5. Animal Welfare

The Supplier must comply with local and national laws related to animal welfare. All materials used in Ted Baker products must comply with the following regulations:

- (a) We do not use real fur within our collections;
- (b) We do not use Angora in our collections;
- (c) We do not use any skins from animals that have been boiled or skinned alive nor will we use Karakul, Slink or other leathers that are from unborn animals;
- (d) We do not use any materials sourced from flora and fauna listed on the Convention of International Trade in Endangered Species of Wild Flora and Fauna or the International Union for the Conservation of Nature;
- (e) We condemn sourcing feather or down from birds that have been plucked whilst alive;
- (f) We condemn the practice of mulesing;
- (g) All leather, hair on hide or hair on skin used in our products will be sourced as the by-product of meat production.

All materials that are derived from animals will be sourced in accordance with the Farm Animal Welfare Council 'Five Freedoms' (see [www.bva.co.uk/News-campaigns-and-policy/Policy/Ethics-and-welfare/Animal-welfare](http://www.bva.co.uk/News-campaigns-and-policy/Policy/Ethics-and-welfare/Animal-welfare) for more information):

- Freedom from hunger or thirst;
- Freedom from thermal or physical discomfort;
- Freedom from pain, injury and disease;
- Freedom from fear and distress; and
- Freedom to indulge in normal behaviour patterns.

## 6. Remediation

If the Supplier becomes aware of a breach of the Code, in any part of the supply chain, the Supplier must immediately notify Ted's Conscience and disclose any details that are deemed necessary by Ted's Conscience in order to accurately assess the problem. The Supplier will co-operate with Ted's Conscience and implement all measures necessary in order to resolve the issue at their own expense.

Ted Baker reserves the right to terminate or blacklist any Supplier in breach of this Code.

## 7. Definitions

**Child:** Any person less than 15 years of age unless local minimum age law stipulates a higher age of 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.

**Child Labour:** Any work by a child or young person younger than the age specified in the above definitions. This also includes any work that is likely to be hazardous or interfere with their education, or cause harm to their physical, mental, spiritual, moral or social health or development.

**Migrant:** Any person living and/or working in a region different to their region of origin.

**Modern Slavery:** A term used to encapsulate all offences in the Modern Slavery Act 2015. This includes slavery, servitude, and forced or compulsory labour; and human trafficking.

**Supplier:** Factories, suppliers, licensees, partners, agents and any other party who supply Ted Baker with goods or materials for sale.

**Young Worker:** Any worker over the age of a child but under the age of 18.

**Ted is committed to continually developing and improving the relationships he has with his Suppliers. If you are in doubt about any of the standards in the Code please do not hesitate to contact Ted's Conscience – two heads are always better than one.**

