

# TED BAKER ETHICAL CODE OF CONDUCT

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Ted Baker's Ethical Code of Conduct (the Code) is the minimum standard that all factories, suppliers, licensees, partners, agents and any associated subcontractors (referred to in this policy as 'Suppliers') must meet. With the support of Ted Baker's Ethics & Sustainability team, Ted Baker (which expression shall include Ted Baker Plc and its subsidiaries) expects 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 Ted Baker's Suppliers are strictly required to adhere to the Code.

### REFERENCES

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

- The Ethical Trading Initiative Base Code;
- The United Nations Universal Declaration of Human Rights;
- The United Nations Guiding Principles on Business and Human Rights
- The International Labour Organisation ('ILO') Core Conventions on Labour Standards, and the Fundamental Principles and Rights at Work

### WORKERS' AND HUMAN RIGHTS STANDARDS

#### EMPLOYMENT IS FREELY CHOSEN

There is no forced, bonded, indentured or involuntary 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 or modern slavery.

#### FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING ARE RESPECTED

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 law prohibits these freedoms, Suppliers must facilitate parallel means of 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. Suppliers shall take a proactive approach to health and safety by minimizing hazards, implementing policies, systems and training designed to prevent accidents, injuries and protect workers. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

Supplier's 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 Workers and provide first aiders and/or medical assistance as required by local law. Suppliers shall assist the worker in obtaining follow-up medical treatment following any work-related injury.

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.

All fire safety precautions must be taken including adequate warning systems, fire safety equipment, clearly marked, accessible exits and sufficient training for all workers.

Suppliers should make reasonable adjustment to remove or reduce occupational risks to pregnant and nursing women, persons with disabilities and Young Workers.

Access to portable water and toilet facilities and, if appropriate, sanitary facilities for food storage and consumption shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of Workers.

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

#### CHILD LABOUR WILL NOT BE USED AND YOUNG WORKERS ARE PROTECTED

There shall be no use or recruitment of Child Labour. Suppliers must have age verification systems in place and upon employment shall hold copies of proof of age of all Workers. A remediation programme must occur if any child is found to be working. Young Workers shall not be employed at night, for overtime, 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. Wages must be paid in a timely manner, regularly, and in fully legal tender.

All employees will be provided with written and understandable 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. There shall be no disciplinary deductions, nor any deductions that are not set by law or collective agreement. All disciplinary measures should be recorded.

#### WORKING HOURS ARE NOT EXCESSIVE

Working hours will comply with national law, collective agreements and benchmark industry standards. Workers shall not be required to work in excess of 48 hours per week and will be provided with sufficient rest days, classified as at least one day off for every 7-day period. The working hours must not prohibit the Worker from enjoying their private and family life.

Overtime must be voluntary, shall not exceed 12 hours per week or be demanded on a regular basis and shall be compensated at a premium rate (at least 125% normal hourly pay). Suppliers must accurately record all working hours and any overtime performed by Workers.

#### NO DISCRIMINATION IS PRACTICED

All Workers shall be afforded equality of treatment and opportunity. 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 or maternity status, sexual orientation, family responsibilities, social union membership or political affiliation. Supplier shall not subject workers to pregnancy, virginity or health screenings tests unless required by law.

#### REGULAR EMPLOYMENT IS PROVIDED

Work must be performed on the basis of a recognised working relationship established through national law and practice. Suppliers must take the necessary measures to ensure that all employees have a legal right to work.

Before entering employment, Suppliers must provide Workers with understandable information about their rights, responsibilities and employment conditions, including working hours, remuneration and terms of payment.

Obligations to Workers shall not be avoided through the use of Labour-Only Contracting, excessive use of Fixed-Term contracts, Subcontracting, or Homeworking 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

Workers must be treated with respect and dignity. 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, psychological or verbal abuse is prohibited. As is the threat of any kind of abuse or other forms of intimidation in the workplace and where applicable, in accommodation or other facilities provided by the Supplier for use by Workers.

All disciplinary procedures must be established in writing, and explained verbally to workers in clear and understandable terms.

## VULNERABLE GROUPS ARE PROTECTED

Suppliers should make provisions to accommodate individuals who are particularly vulnerable to discrimination, exploitation or abuse. This includes, but is not limited to; women, migrants, minorities and those in non-standard employment such as homeworkers and temporary workers. Land rights of communities, including indigenous peoples, must be protected.

## ENVIRONMENTAL STANDARDS

### ENVIRONMENTAL PROTECTION AND MANAGEMENT

Suppliers must comply with environmental rules, regulations and standards applicable to the workplace, the products produced and the methods of manufacture. Suppliers should put in place procedures to prevent or minimise any negative impact on the environment, community and natural resources. Suppliers should continuously monitor their environmental performance and disclose to Ted Baker, on request, their energy and water use, effluents, emissions, carbon footprint, use of chemicals and disposal of waste.

### RESPONSIBLY MANAGE CHEMICALS

Suppliers must follow and comply with Ted Baker's Restricted Substances List (RSL), as amended from time to time. The List can be found in Appendix 2 of Ted Baker's Testing Compliance and Safety Policy. Changes and updates to the RSL will be communicated to Suppliers by [production.testing@Tedbaker.com](mailto:production.testing@Tedbaker.com). All chemicals and hazardous materials must be safely handled, transported and disposed of according to law.

Suppliers may contact [production.testing@Tedbaker.com](mailto:production.testing@Tedbaker.com) should they require further information on this expectation.

### ANIMAL WELFARE & RESPONSIBLE SOURCING OF MATERIALS

Ted Baker is committed to ensuring that all raw materials used in our products are obtained in a responsible and sustainable way, and that social and environmental impacts are taken into account during the sourcing process. Due to Ted's commitments to responsible sourcing, Suppliers must adhere to the requirements set out in our Animal Welfare and Responsible Materials Policy while respecting human rights, preserving natural resources and helping maintain biodiversity. This Policy can be found in the Supplier Manual and on the Ted Baker website.

Our minimum requirements, with respect to the responsible sourcing of materials, are that:

- Suppliers must comply with our Animal Welfare and Responsible Materials Policy and can provide all relevant information needed about the origin of these materials.
- Suppliers must respect animal welfare and work progressively towards adopting healthy and humane practices towards animals based on the Farm Animal Council Five Freedoms and other best available standards.
- The Supplier must comply with national laws and industry standards related to animal welfare. All materials used in Ted Baker products must comply with the following regulations:
  - a) No real fur within our collections;
  - b) We do not use Alpaca, Angora or Mohair in our collections;
  - c) No feathers or down in our collections;<sup>1</sup>
  - d) No skin from animals that have been boiled or skinned alive nor skin from unborn animals such as Karakul/Astrakhan (unborn lamb) or Slink (unborn calf)
  - e) No Bone, Horn, Shell and Teeth, including pearls and coral;
  - f) No materials from endangered, threatened or exotic species as listed by the Convention of International Trade in Endangered Species of Wild Flora and Fauna or the International Union for the Conservation of Nature;
  - g) All leather, hair on hide or hair on skin to be sourced as the by-product of meat production.

## ETHICAL STANDARDS

### BUSINESS INTEGRITY

Suppliers must comply with national laws concerning bribery, corruption, extortion, embezzlement or unethical business practices, as well as Ted Baker's Anti-Bribery and Corruption Policy. There shall be no improper advantage sought including the promising, offering, paying, soliciting or accepting of bribes or facilitation payments.

Suppliers must not provide false or misleading information to Ted Baker or any third-party auditor.

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<sup>1</sup>Third-party suppliers are permitted to use responsibly sourced feather and down products, providing they have been certified to the Responsible Down Standard (RDS). Please refer to Ted's Third Party policy for more details.

#### THE CODE WILL BE UPHELD BY ALL SUBCONTRACTORS AND HOMEWORKERS

If a Supplier wishes to subcontract 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 Subcontractor with a copy of the Code and ensure that all sections of the Code are fully understood by the Subcontractor and complied with. Suppliers are responsible for communicating this policy, ensuring compliance and carrying out due diligence in any factories or subcontractors making goods for Ted Baker.

Ted Baker has an open and positive position to using Homeworking in the manufacturing process and recognises that the provision of Homeworking is a valuable source of income, particularly for women.

#### MONITORING AND REMEDIATION

Suppliers are expected to implement and maintain the necessary systems in order to ensure compliance to this Code. As part of the monitoring of this Code Suppliers must agree to periodic audit or inspection.

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

Ted Baker is committed to continually developing and improving relationships with its Suppliers. If you are in doubt about any of the standards in the Code please do not hesitate to contact Ted's Ethics & Sustainability team by email:

[ethical.sustainable@tedbaker.com](mailto:ethical.sustainable@tedbaker.com)

Without limiting or affecting any other right or remedy available to it, Ted Baker may terminate any Supplier agreement at any time if Supplier is in breach of this Code. The Supplier agrees to indemnify and hold Ted Baker harmless from any claims, loss, damage, or other detriment, resulting from any Supplier non-compliance.

#### 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. 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.

**The Five Freedoms:** An internationally recognised set of five values related to animal welfare; 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.

In the case of inconsistency between translated versions of this Code, reference shall default to the English language version.